

Dragun Corporation

30445 Northwestern Hwy. • Suite 260 • Farmington Hills, MI, USA 48334 • 248-932-0228 • FAX 248-932-0618

August 16, 2005

Mr. Brian Freeman, Senior Chemist
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division
United States Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SUBJECT: Limited Soil Removal Report - Deficiency
Former Morenci Facility
Morenci, Michigan
Project #1004-05

Dear Mr. Freeman:

As presented in your letter to Mr. Jeffrey A. Bolin dated July 28, 2005, based on the EPA's review of the Limited Soil Removal Report and a telephone conversation between you and Mr. Bolin on July 22, 2005, the EPA is offering tentative approval subject to the completion of the one noted report deficiency. The noted report deficiency involved missing printed names of the Authorized Agent receiving the waste at its destination on each of the Onyx Non-Hazardous Special waste Manifests contained in Appendix D of the report.

Enclosed are three completed copies of the "Onyx Non-Hazardous Special Waste Manifests" for inclusion with the report previously forwarded to the USEPA and entitled, "Limited Soil Removal Report, Former Henkel Morenci Facility, Morenci, Michigan, **USEPA ID No: MID 058 723 867,**" dated July 18, 2005. It is our understanding that correction of this deficiency results in approval of the Limited Soil Removal Report and accordingly, addresses the outstanding issue identified in Section V.A. of the AAO.

Additionally, The Dragun Corporation will be submitting the Description of Current Conditions Report to you by August 22, 2005. If you have any questions or comments regarding this report or wish to discuss these matters in greater detail, please contact us at (248) 932-0228.

Sincerely,

THE DRAGUN CORPORATION



Allan Clifford Lawton, M.Sc.
Geologist



Jeffrey A. Bolin, M.S., CHMM
Vice President – Technical Operations

Enclosure

ACL/JAB/lrm

Cc: Jack Garavanta, Henkel Technologies, w/enclosure
Glenn Young, Esq., Henkel, w/o enclosure
Ken Gold, Esq, HMS&C, w/o enclosure

Limited Soil Removal Report
Former Henkel Morenci Facility
Morenci, Michigan
USEPA ID No: MID 058 723 867

Prepared for
Mr. Jack Garavanta, Director
Environmental Compliance
Henkel Corporation - Henkel Technologies
32100 Stephenson Highway
Madison Heights, Michigan 48071

Prepared by
The Dragun Corporation
30445 Northwestern Highway, Suite 260
Farmington Hills, Michigan 48334
Phone: (248) 932-0228
Fax: (248) 932-0618
Project #1004-05

July 15, 2005



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

MID 058 123 867

REPLY TO THE ATTENTION OF

DE-9J

July 28, 2005

Mr. Jeffrey A. Bolin, M.S., CHMM
Environmental Scientist
Dragun Corporation
30445 Northwestern Highway - Suite 260
Farmington Hills, MI 48334

RE: Limited Soil Removal Report
Henkel Surface Technologies
Morenci, MI Site

Dear Mr. Bolin:

The U.S. Environmental Protection Agency Region 5 (U.S. EPA) has received the Limited Soil Removal Report, dated July 15, 2005, citing the removal of soils from Waste Area 6 of the Henkel Morenci Site. We have reviewed the report, and based on our telephone conversation on July 22, 2005, U.S. EPA is offering tentative approval subject to the completion of one noted deficiency below:

Deficiency: In Appendix D of the Report, all "Onyx Non-Hazardous Special Waste Manifests" should contain the printed name of the Authorized Agent receiving the waste at its destination, as well as the signature. Please submit three (3) sets of these corrected forms comprising of Appendix D to U.S. EPA, for inclusion in the Report.

Once received, these updated manifests can be appended to your submitted Report copies, and final approval can be issued. However, please continue other efforts such as the Description of Current Conditions Report, as this interim approval is sufficient for continued work on this and/or other areas of the project.

If you have any questions about this correspondence, please call me at (312)353-2720. Any legal questions regarding the above issues at the site can be addressed to Andre Daugavietis, Associate Regional Counsel, at (312) 886-6663.

Sincerely,

Brian P. Freeman
Senior Chemist, Corrective Action Project Manager
U.S. EPA Region 5, RCRA Enforcement & Compliance Assurance

cc: George Hamper, Chief, WPTD/ECAB Corrective Action Section
Pete Quackenbush, MDEQ
Andre Daugavietis, Esq. C-14J
Jack Garavanta, Henkel Corporation

Dragun Corporation

30445 Northwestern Hwy. • Suite 260 • Farmington Hills, MI, USA 48334 • 248-932-0228 • FAX 248-932-0618

July 15, 2005

Mr. Brian Freeman
Senior Chemist
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division
United States Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SUBJECT: Limited Soil Removal Report
Former Henkel Morenci Facility
Morenci, Michigan
USEPA ID No: MID 058 723 867
Project #1004-05

Dear Mr. Freeman:

On behalf of Henkel Technologies (HT), enclosed is the Report detailing the soil removal and testing activities at the HT property located in Morenci, Michigan (the Site). This report was prepared in response to Section V.A of the AGREED ADMINISTRATIVE ORDER (AAO) between representatives of the United States Environmental Protection Agency (USEPA) Region 5 and HT that was signed on February 14, 2005.

In the AAO, it was agreed that HT would conduct additional soil removal between the former Waste Storage Area 6 and Bean Creek to address outstanding concerns of the USEPA at the Site.

Soil excavation was conducted from May 18, 2005 to June 3, 2005, and preceded along the western side of the former excavation area while maintaining stable bank conditions along Bean Creek. The purpose of the excavation was to remove a limited amount of soil such that concentrations of lead remaining in soil are less than the residential direct contact cleanup criteria of 400 milligrams per kilogram.

If you have any questions regarding this information, please contact one of us at (248) 932-0228.

Sincerely,

THE DRAGUN CORPORATION



Allan Clifford Lawton, M.Sc.
Geologist



Jeffrey A. Bolin, M.S., CHMM
Environmental Scientist

Attachment

ACL/JAB/lrm

Cc: Mr. Jack Garavanta, HT (w/enclosures)
Kenneth C. Gold, Esq., HMS&C (w/enclosures)
Glenn Young, Esq., Henkel Corporation (w/enclosures)

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2	Approximate Excavation Limits and Verification Sample Location Map

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B	LABORATORY DATA SHEETS – VERIFICATION SAMPLES
C	LABORATORY DATA SHEETS – WASTE CHARACTERIZATION
D	SOIL TRANSPORTATION AND DISPOSAL DOCUMENTATION

INTRODUCTION

The Dragon Corporation, on behalf of Mr. Jack Garavanta of Henkel Technologies (HT), directed limited soil removal activities at the HT facility located in Morenci, Michigan (the "Site," see Figures 1 and 2). This soil removal was conducted in response to the AGREED ADMINISTRATIVE ORDER (AAO) between representatives of the United States Environmental Protection Agency (USEPA) Region 5 and HT that was signed on February 14, 2005.

In the AAO, it was agreed that HT would conduct additional soil removal between the former Waste Storage Area 6 (Area 6). The purpose of the additional soil removal was to remove soil adjacent to Area 6 containing lead in excess of 400 milligrams per kilogram (mg/kg), to the extent that the bank of Bean Creek remained stable.

The Dragon Corporation directed the additional excavation of the western sidewall in Area 6 and collected verification samples to confirm that a sufficient volume of soil was removed. These activities were conducted between May 17, 2005, and June 3, 2005, in accordance with the approved Work Plan dated March 9, 2005.

In general, these activities included (1) excavation and off-site disposal of approximately 1,430 cubic yards of soil, (2) collection and laboratory testing of 20 verification soil samples for the presence of total lead, (3) backfilling of the excavation with clean sand, and (4) final grading and seeding of the excavated area. This report documents the activities of the limited soil removal and provides an evaluation of the results of laboratory testing relative to the cleanup goals established in the AAO.

PROJECT HISTORY

Numerous investigations have been completed at the site. The investigations/reports conducted are listed in the following text.

- HT submits Revised Closure Plan to MDEQ – 1992
- HT submits Interim Soil Report - Closure Activities to MDEQ - January 31, 1995
- HT submits Groundwater Investigation Report - Closure Activities to MDEQ - March 27, 1995
- HT submits Soil Characterization Report to MDEQ - October 27, 1997
- HT submits Groundwater Sampling Report to MDEQ - January 28, 1999
- HT submits Limited Soil Removal Report to MDEQ - February 14, 2000
- HT submits Summary Report, Supplemental Investigation to Address USEPA Concerns - October 30, 2002

- TechLaw, on behalf of USEPA Region, conducts sediment sampling in Bean Creek - July 20, 2004

Based on the results of these investigations, the USEPA and HT negotiated the AAO, signed February 14, 2005. The AAO required HT to conduct limited soil removal adjacent to the western edge of Area 6 and Bean Creek. During previous excavation of Area 6 (1999), significant debris (unrelated to historic operations conducted by HT and its predecessors) was encountered and the excavation was terminated. The debris consisted of deteriorated metal/tin cans, broken milk bottles, china cups, etc., appearing consistent with reported historic use of the Site by a dairy farm and creamery. In 1999, approximately 1,560 cubic yards of soil were excavated and removed from Area 6 and disposed off site.

Agreed Administrative Order

The AAO was signed by HT and the USEPA Region 5 on February 14, 2005.

Soil Excavation Work Plan

As per the AAO, The Dragun Corporation, on behalf of HT, assembled a Work Plan detailing the additional removal of soil. Consistent with the AAO, the Work Plan reflected that the soil excavation would proceed along the western side of the former excavation area, to the extent that conditions along the bank of Bean Creek remain stable. The Work Plan was approved by the EPA on March 22, 2005.

SOIL EXCAVATION

On behalf of HT, The Dragun Corporation supervised the soil removal and testing activities at the Site. Soil excavation, transportation, and disposal were conducted by GeoDynamics, Inc. Work progress photographs are presented in Appendix A.

In the AAO, it was agreed that HT would conduct additional soil removal between the former Waste Storage Area 6 and Bean Creek to address outstanding concerns of the USEPA at the Site. Soil excavation proceeded along the western side of the Area 6 excavation while maintaining stable conditions along the bank of Bean Creek. The purpose of the excavation was to remove soil such that concentrations of lead remaining in soil are less than residential direct contact cleanup criteria of 400 mg/kg.

The excavation activities were conducted from May 17, 2005, through June 3, 2005. Approximately 1,430 cubic yards of soil were excavated, removed, and stockpiled on plastic on

site (see Photograph 3 in Appendix A). The soil stock pile was covered with plastic each night to prevent the soil from being transported by the wind and prevent precipitation from contacting the soil (see Photograph 11 in Appendix A). To prevent the introduction of soil into Bean Creek during site activities, the excavation work adjacent to the creek proceeded slowly and included the use of a silt fence (see Photographs 20, 21, and 22 in Appendix A).

In general, the excavation was initiated along the western boundary of the former Area 6 excavation and proceeded to within five to seven feet of the bank of Bean Creek (see Figure 2). The excavation varied in depth from two to ten feet below the ground level and was generally six to eight feet deep along the west side of the excavation (adjacent to Bean Creek). Any further excavation would have jeopardized the bank stability and caused materials to fall into Bean Creek. The western face of the excavation was generally straight; however, the excavation wall extended approximately five feet east into the excavation at two locations (See Figure 2). At these locations, the presence of two large trees (see Photograph 13 in Appendix A) or large concrete debris forced the excavation wall to be diverted in order to maintain the stable creek bank and prevent debris entering the creek. The floor of the excavation was terminated in native fine to coarse sand. The excavation intersected the water table at several locations near Bean Creek (see Photograph 8 in Appendix A).

It should be noted that one of the trees removed during the excavation was at least 75 years old (based on counting growth rings). The milk bottle and tin can debris were present below this tree; therefore, the fill was placed along the creek bank at least 75 years ago. The age of the tree adds validity to the reported historic use of the Site for dairy processing from 1917 to 1927.

Verification Sampling and Testing

The Dragoon Corporation calculated the number of required soil verification samples based on the MDEQ - Waste Management Division (WMD) Verification of Soil Remediation Guidance Document dated April 1994, Revision 1. Based on measurements taken by The Dragoon Corporation during the excavation activities, the excavation floor had a total area of approximately 7,600 square feet (ft²) and the excavation walls had a total area of approximately 2,280 ft². Based on these areas, the Verification of Soil Remediation Guidance Document indicates that eight floor samples and eight sidewall samples are required. The Dragoon Corporation collected eight floor samples and 12 sidewall samples.

Soil verification samples were collected during the soil excavation activities from May 17 through May 20, 2005. The verification samples were submitted to KAR Laboratories in Kalamazoo and tested for total lead. Review of the laboratory data (see Appendix B) indicates that all eight floor verification samples and eight of the 12 sidewall verification samples contained concentrations of total lead that ranged from 4 to 55 mg/kg, one to two magnitudes below the cleanup target of 400 mg/kg.

Each of the four verification samples that exceeded the cleanup target were collected from the dairy/creamery bottle and tin can debris (see Photographs 5 and 7 in Appendix A) located in the west wall of the excavation. These four verification samples contained concentrations of total lead that ranged from 427 to 793 mg/kg. Although these concentrations remain, it is The Dragun Corporation's opinion that the objectives of the AAO have been met. The basis for this opinion is the following:

1. The Bean Creek bank stability was maintained during the excavation. Any additional soil removal would have likely compromised the bank stability, required the removal of two large (old, healthy) trees (see Photograph 13 in Appendix A), and would possibly have resulted in materials entering Bean Creek.
2. The volume of tin can debris has been significantly reduced as a result of these removal activities.
3. The remaining volume, which was left in place to maintain bank stability, is minimal and based on location and volume is not likely to have significant impact to human health and the environment.

Soil Disposal

A composite sample of the excavated soil was collected and sent to KAR Laboratories for testing. Laboratory data (see Appendix C) indicate that excavated soils are non-hazardous. Excavated soils were removed from the Site from May 31 to June 1, 2005. The soils were transported to the Arbor Hills landfill in Northville, Michigan for disposal. The Arbor Hills landfill is a Type II landfill. Soil disposal documentation is presented in Appendix D.

The excavation was backfilled with clean sand and graded between May 31, 2005 and June 3, 2005 (see Photographs 15, 16, 17, and 18). Topsoil was placed on the backfill (see Photographs 20, 21, and 22) and the area was seeded with grasses during June 2005.

CONCLUSIONS

The Dragun Corporation, on behalf of Mr. Jack Garavanta of HT, directed limited soil removal activities at the HT facility located in Morenci, Michigan. This soil removal was conducted in response to the AAO between representatives of the USEPA Region 5 and HT that was signed on February 14, 2005.

In the AAO, it was agreed that HT would conduct additional soil removal between the former Waste Storage Area 6 and Bean Creek. The purpose of the additional soil removal was to

remove soil adjacent to Area 6 containing lead in excess of 400 mg/kg, to the extent that the bank of Bean Creek remained stable.

The Dragun Corporation directed the additional excavation of the western sidewall in Area 6 and collected verification samples to confirm that a sufficient volume of soil was removed. These activities were conducted between May 17, 2005, and June 3, 2005, in accordance with the approved Work Plan dated March 9, 2005.

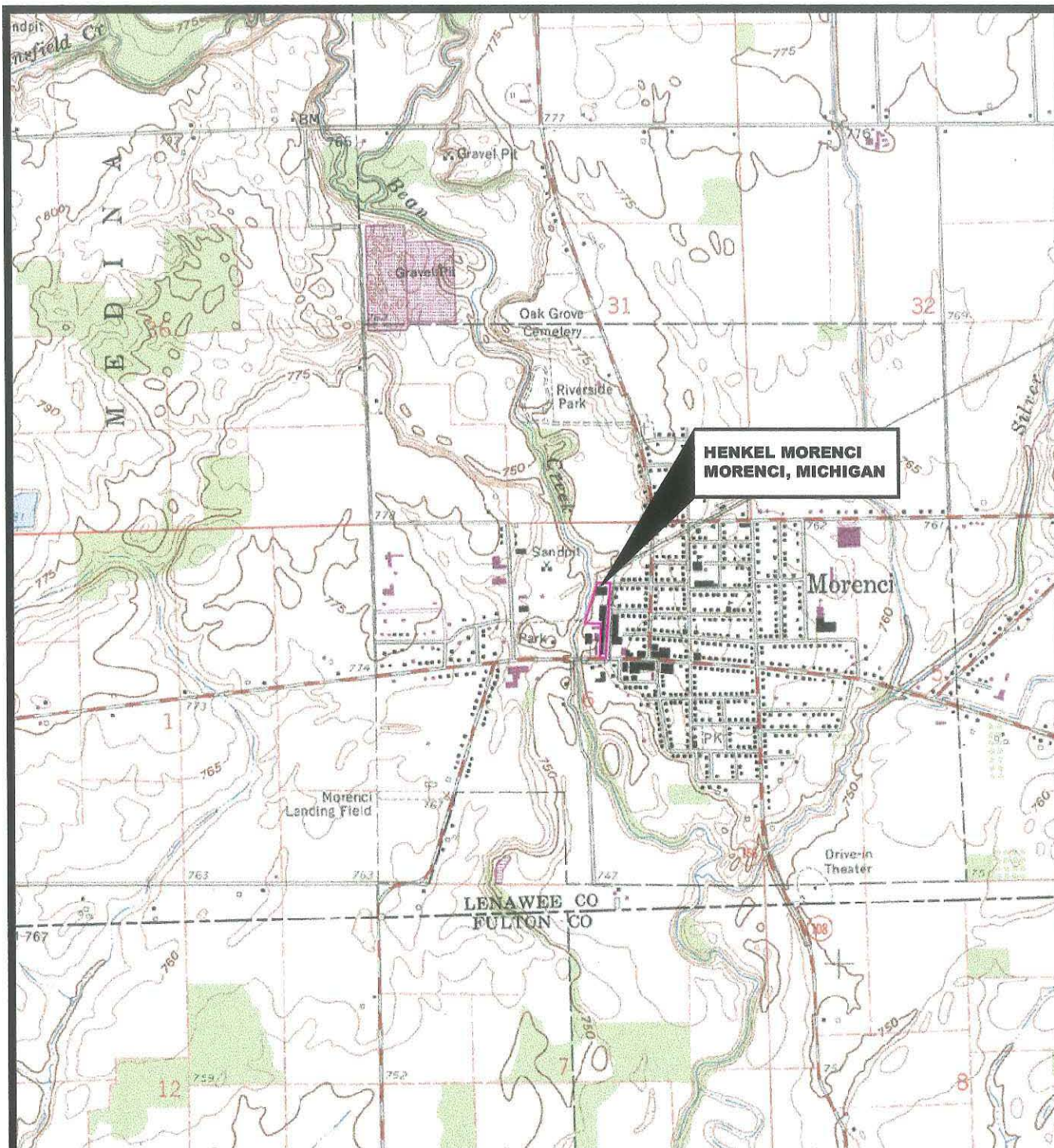
In general, these activities included (1) excavation and off-site disposal of approximately 1,430 cubic yards of soil at a Type II landfill, (2) collection and laboratory testing of 20 verification soil samples for the presence of total lead, (3) backfilling of the excavation with clean sand fill material, and (4) final grading and seeding of the area.

Sixteen of the twenty verification samples contained concentrations of total lead that were below 400 mg/kg. Each of the four verification samples that exceeded the cleanup target were collected from the dairy/creamery bottle and tin can debris located in the west wall of the excavation. These four verification samples contained concentrations of total lead that ranged from 427 to 793 mg/kg. Although these concentrations remain, it is The Dragun Corporation's opinion that the objectives of the AAO have been met. The basis for this opinion is the following:

1. The Bean Creek bank stability was maintained during the excavation. Any additional soil removal would have likely compromised the bank stability, required the removal of two large (old, healthy) trees (see Photograph 13 in Appendix A), and would possibly have resulted in materials entering Bean Creek.
2. The volume of tin can debris has been significantly reduced as a result of these removal activities.
3. The remaining volume, which was left in place to maintain bank stability, is minimal and based on location and volume, is not likely to have significant impact to human health and the environment.

FIGURES

FIGURES



SOURCE: MORENCI, MICHIGAN-OHIO QUADRANGLE (U.S. GEOLOGICAL SURVEY, 1977).



SCALE



0 2000 FEET

FIGURE 1
SITE LOCATION MAP
HENKEL MORENCI
MORENCI, MICHIGAN

APPENDIX
A

APPENDIX A
PROPERTY PHOTOGRAPHS



5.17.2005

TREE REMOVAL OPERATIONS ON MAY 17, 2005

PHOTOGRAPH 1
HENKEL MORENCI
MORENCI, MICHIGAN



TARGET AREA ON MAY 17, 2005, PRIOR TO EXCAVATION ACTIVITIES

PHOTOGRAPH 2
HENKEL MORENCI
MORENCI, MICHIGAN

The Dragoon Corporation



5.17.2005

PLACEMENT OF PLASTIC SHEETING ON GROUND SURFACE
IN SOIL STOCK PILE AREA ON MAY 17, 2005

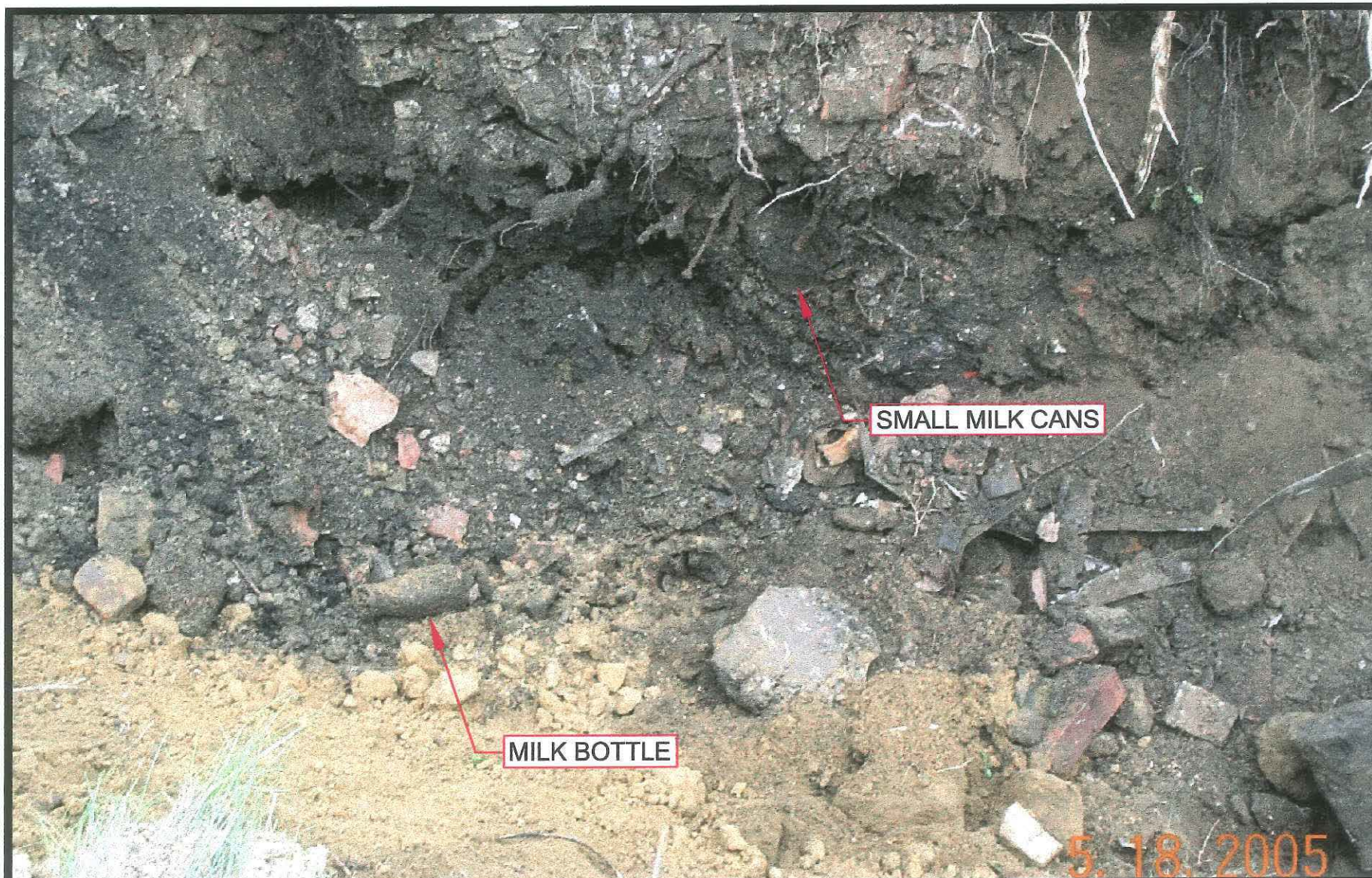
PHOTOGRAPH 3
HENKEL MORENCI
MORENCI, MICHIGAN



SMALL MILK CANS OBSERVED IN TARGET AREA

PHOTOGRAPH 4
HENKEL MORENCI
MORENCI, MICHIGAN

The Dragoon Corporation



MILK BOTTLE AND SMALL MILK CANS IN WEST FACE OF EXCAVATION

PHOTOGRAPH 5
HENKEL MORENCI
MORENCI, MICHIGAN



MILK CAN TOP

PHOTOGRAPH 6
HENKEL MORENCI
MORENCI, MICHIGAN



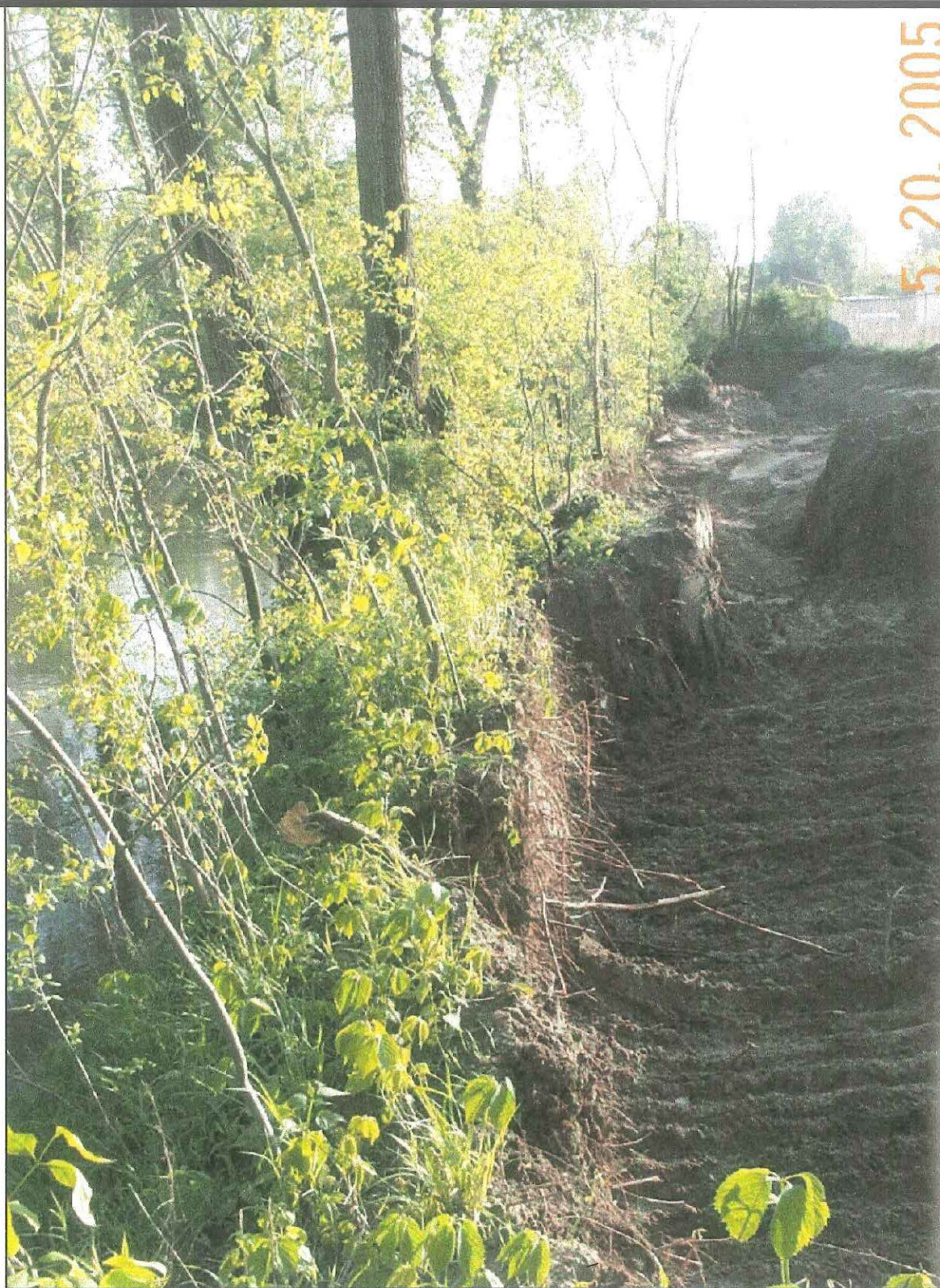
MILK CAN TOPS IN WEST FACE OF EXCAVATION

PHOTOGRAPH 7
HENKEL MORENCI
MORENCI, MICHIGAN



VIEW TO NORTH ALONG WEST FACE OF EXCAVATION

PHOTOGRAPH 8
HENKEL MORENCI
MORENCI, MICHIGAN



VIEW TO NORTH ALONG WEST
FACE OF EXCAVATION

PHOTOGRAPH 9
HENKEL MORENCI
MORENCI, MICHIGAN



VIEW TO NORTH OF NORTHWEST CORNER OF EXCAVATION

PHOTOGRAPH 10
HENKEL MORENCI
MORENCI, MICHIGAN

The Dragoon Corporation



SOIL STOCK PILE COVERED WITH PLASTIC SHEETING ON MAY 19, 2005

PHOTOGRAPH 11
HENKEL MORENCI
MORENCI, MICHIGAN



VIEW OF EXCAVATION FROM WEST SIDE OF BEAN CREEK ON JUNE 2, 2005

PHOTOGRAPH 12
HENKEL MORENCI
MORENCI, MICHIGAN



VIEW OF EXCAVATION FROM WEST SIDE OF BEAN CREEK ON JUNE 2, 2005

PHOTOGRAPH 13
HENKEL MORENCI
MORENCI, MICHIGAN



VIEW TO WEST ON JUNE 2, 2005; SOIL STOCK PILE HAS BEEN REMOVED

PHOTOGRAPH 14
HENKEL MORENCI
MORENCI, MICHIGAN

The Dragoon Corporation



VIEW TO NORTHWEST OF BACKFILLED EXCAVATION ON JUNE 2, 2005

PHOTOGRAPH 15
HENKEL MORENCI
MORENCI, MICHIGAN



VIEW TO SOUTH OF BACKFILLED EXCAVATION ON JUNE 2, 2005

PHOTOGRAPH 16
HENKEL MORENCI
MORENCI, MICHIGAN

The Dragon Corporation



VIEW TO NORTH OF WEST SIDE OF BACKFILLED EXCAVATION ON JUNE 2, 2005

PHOTOGRAPH 17
HENKEL MORENCI
MORENCI, MICHIGAN



6.2.2005

VIEW TO SOUTH OF WEST SIDE OF BACKFILLED EXCAVATION ON JUNE 2, 2005

PHOTOGRAPH 18
HENKEL MORENCI
MORENCI, MICHIGAN



VIEW TO WEST ON JUNE 9, 2005
EXCAVATION BACKFILLING AND GRADING COMPLETE

6.9.2005
PHOTOGRAPH 19
HENKEL MORENCI
MORENCI, MICHIGAN



VIEW TO SOUTH OF EXCAVATION AREA ON JUNE 9, 2005

PHOTOGRAPH 20
HENKEL MORENCI
MORENCI, MICHIGAN



6. 9. 2005

VIEW TO NORTHWEST OF EXCAVATION AREA ON JUNE 9, 2005

PHOTOGRAPH 21
HENKEL MORENCI
MORENCI, MICHIGAN



VIEW TO NORTH FROM SOUTHWEST CORNER OF
EXCAVATION AREA ON JUNE 9, 2005

6. 9. 2005
PHOTOGRAPH 22
HENKEL MORENCI
MORENCI, MICHIGAN



VIEW TO SOUTHEAST OF EXCAVATION AREA FROM WEST
BANK OF BEAN CREEK ON JUNE 9, 2005

PHOTOGRAPH 23
HENKEL MORENCI
MORENCI, MICHIGAN

APPENDIX B

LABORATORY DATA SHEETS
VERIFICATION SAMPLES

Dragun Corporation
30445 Northwestern Hwy Ste 260
Farmington Hills, MI 48334

KAR Project No. : 052318
Date Reported : 05/25/05
Date Activated : 05/23/05
Date Due : 05/25/05
Date Validated : 05/25/05

Attn : Mr. Allan Clifford Lawton

Project

Description : Analysis of four soil samples from Morenci (#1004-05).

Dear Client,

Your laboratory data is presented to you in this report. Unless otherwise stated under the "Comments" heading, all tests were performed within the maximum allowable holding times, have met or exceeded QC requirements and the result represents the sample as it was received.

If you wish to contact us about this work please mention KAR Project No. 052318. To arrange additional sampling or testing please contact our Client Services Department. If you have a question regarding quality assurance please contact William Rauch.

Thank you for the opportunity to serve you. Please do not hesitate to call if we can provide additional assistance.

Respectfully submitted,



Michael J. Jaeger
Director of Laboratories

POSITIVE RESULTS SUMMARY REPORT

Client: *Dragun Corporation*

KAR Project No.: **052318**

Date Reported: **5/25/2005**

Project

Description: *Analysis of four soil samples from Morenci (#1004-05).*

Sample Description: **"V-27"**

Test	Positive Result Concentration	Units
Lead, total	4	mg/kg dry sample

Sample Description: **"V-28"**

Test	Positive Result Concentration	Units
Lead, total	5	mg/kg dry sample

Sample Description: **"V-29"**

Test	Positive Result Concentration	Units
Lead, total	5	mg/kg dry sample

Sample Description: **"V-30"**

Test	Positive Result Concentration	Units
Lead, total	5	mg/kg dry sample

This Positive Results Summary Report provides an overview of the sample set and CONTAINS ONLY RESULTS ABOVE THE REPORTING LIMIT. It should not be used as a substitute for the attached detail report.

KAR Laboratories, Inc.

(269) 381-9666

Positive Results Summary Report

Page 1 of 1

LABORATORY DETAIL REPORT

KAR Project No. : **052318**

Date Reported : **05/25/05**

Client: **Dragun Corporation**

Project

Desc. : **Analysis of four soil samples from Morenci (#1004-05).**

Sample ID : **"V-27"**

Sampled By : **CL of Dragun Corporation**

Sample Date : **5/19/2005**

Sample Time : **1015**

Date Received : **5/23/2005**

Sample Type : **soil**

KAR Sample No. : **052318-01**

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep, metals	Completed		EPA 30xx,200.x	05/23/05	PML	
Lead, total	4	mg/kg dry sample	EPA 6010B	05/24/05	DBL	
Dry weight solids	95.13	% by weight	SM 2540 B mod.	05/23/05	BLF	

Sample ID : **"V-28"**

Sampled By : **CL of Dragun Corporation**

Sample Date : **5/19/2005**

Sample Time : **1020**

Date Received : **5/23/2005**

Sample Type : **soil**

KAR Sample No. : **052318-02**

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep, metals	Completed		EPA 30xx,200.x	05/23/05	PML	
Lead, total	5	mg/kg dry sample	EPA 6010B	05/24/05	DBL	
Dry weight solids	94.46	% by weight	SM 2540 B mod.	05/23/05	BLF	

Sample ID : **"V-29"**

Sampled By : **CL of Dragun Corporation**

Sample Date : **5/19/2005**

Sample Time : **1025**

Date Received : **5/23/2005**

Sample Type : **soil**

KAR Sample No. : **052318-03**

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep, metals	Completed		EPA 30xx,200.x	05/23/05	PML	
Lead, total	5	mg/kg dry sample	EPA 6010B	05/24/05	DBL	
Dry weight solids	95.65	% by weight	SM 2540 B mod.	05/23/05	BLF	

KAR Laboratories, Inc.

(269) 381-9666

Laboratory Detail Report

Page 1 of 2

LABORATORY DETAIL REPORT

KAR Project No. : **052318**

Client: *Dragun Corporation*

Date Reported : **05/25/05**

Project

Desc. : *Analysis of four soil samples from Morenci (#1004-05).*

Sample ID : **"V-30"**

Sampled By : *CL of Dragun Corporation*

Date Received : **5/23/2005**

Sample Date : **5/19/2005**

Sample Type : **soil**

Sample Time : **1030**

KAR Sample No. : **052318-04**

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep, metals	Completed		EPA 30xx, 200.x	05/23/05	PML	
Lead, total	5	mg/kg dry sample	EPA 6010B	05/24/05	DBL	
Dry weight solids	94.77	% by weight	SM 2540 B mod.	05/23/05	BLF	

Sample ID : **Laboratory Method Blank-Soil**

Sampled By :

Date Received : **5/23/2005**

Sample Date :

Sample Type : **LMB-soil**

Sample Time :

KAR Sample No. : **052318-05**

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep, metals	Completed		EPA 30xx, 200.x	05/23/05	PML	
Lead, total	<1	mg/kg dry sample	EPA 6010B	05/24/05	DBL	

KAR Laboratories, Inc.

(269) 381-9666

Laboratory Detail Report

Page 2 of 2

Dragun Corporation
30445 Northwestern Hwy Ste 260
Farmington Hills, MI 48334

KAR Project No. : 052318
Date Reported : 05/25/05
Date Activated : 05/23/05
Date Due : 05/25/05
Date Validated : 05/25/05

Attn : Mr. Allan Clifford Lawton

Project

Description : Analysis of four soil samples from Morenci (#1004-05).

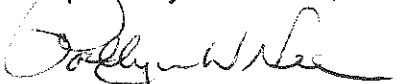
Dear Client,

Please find attached a copy of the QC Report for KAR Project No. 052318. The report might contain a second section entitled "QC Batch Report". This section will contain matrix-specific quality control information for the analytical batch, if applicable. Unless otherwise stated under the "Comments" heading, all tests were performed within the maximum allowable holding times, have met or exceeded QC requirements and the result represents the sample as it was received.

For duplicate sample calculations, concentrations are considered zero if less than or equal to the reporting limit. For spiked sample calculations, original sample concentration is also considered zero if less than or equal to the reporting limit. For general QA/QC procedures please consult the KAR Laboratories Quality Assurance Manual.

I hope that you find our services accurate and complete. Please do not hesitate to call if we can provide additional assistance.

Respectfully submitted,



Pollyann W. Nee
Quality Assurance Manager

KAR Laboratories, Inc.

Quality Control Acceptance Criteria

Soil Matrix

KAR Project 052318

May 25, 2005

Fraction	Analyte	Recovery Range (%)	RPD
Metals	Lead, total	37-176	21

QUALITY CONTROL REPORT

KAR Project No. : 052318

Date Reported : 05/25/05

Client: *Dragun Corporation*

Project Description : *Analysis of four soil samples from Morenci (#1004-05).*

Sample ID : **"V-27"**

Sampled By : *CL of Dragun Corporation*

Date Sampled : 5/19/2005

Sample Type : *soil*

Date Received : 5/23/2005

Time Sampled : 1015

Sample No. : 052318-01

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On By	QC Batch	Comments
Prep. metals	Completed								EPA 30xx.200.x	05/23/05 PML		
Lead, total	4 mg/kg dry sample	41.228	98.7 %						EPA 6010B	05/24/05 DBL	050524APE	
Dry weight solids	95.13 % by weight								SM 2540 B mod.	05/23/05 BLF	060523DW1	

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Quality Control Report

Page 1 of 5

QUALITY CONTROL REPORT

KAR Project No. : 052318

Date Reported : 05/25/05

Client: Dragun Corporation

Project Description : Analysis of four soil samples from Morenci (#1004-05).

Sample ID : **"V-28"**

Sampled By : CL of Dragun Corporation

Date Sampled : 5/19/2005

Sample Type : soil

Date Received : 5/23/2005

Time Sampled : 1020

Sample No. : 052318-02

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On	By	QC Batch	Comments
Prep. metals	Completed								EPA 30xx.200.x	05/23/05	PML		
Lead, total	5 mg/kg dry sample					4.626	4.743	2.5 %	EPA 6010B	05/24/05	DBL	050524APE	
Dry weight solids	94.46 % by weight								SM 2540 B mod.	05/23/05	BLF	050523DW1	

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Quality Control Report

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QUALITY CONTROL REPORT

KAR Project No. : 052318

Date Reported : 05/25/05

Client: Dragun Corporation

Project Description : Analysis of four soil samples from Morenci (#1004-05).

Sample ID : "V-29"

Sampled By : CL of Dragun Corporation

Date Sampled : 5/19/2005

Sample Type : soil

Date Received : 5/23/2005

Time Sampled : 1025

Sample No. : 052318-03

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On	By	QC Batch	Comments
Prep. metals	Completed								EPA 30xx.200.x	05/23/05	PML		
Lead, total	5 mg/kg dry sample								EPA 6010B	05/24/05	DBL	050524APE	
Dry weight solids	95.85 % by weight								SM 2540 B mod.	05/23/05	BLF	050523OW1	

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Quality Control Report

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QUALITY CONTROL REPORT

KAR Project No. : 052318

Date Reported : 05/25/05

Client: *Dragun Corporation*

Project Description : *Analysis of four soil samples from Morenci (#1004-05).*

Sample ID : **"V-30"**

Sampled By : *CL of Dragun Corporation*

Date Sampled : 5/19/2005

Sample Type : *soil*

Date Received : 5/23/2005

Time Sampled : 1030

Sample No. : 052318-04

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On By	QC Batch	Comments
Prep. metals	Completed								EPA 30xx, 200 x	05/23/05 PML		
Lead, total	5 mg/kg dry sample								EPA 8010B	05/24/05 DBL	050524APE	
Dry weight solids	94.77 % by weight								SM 2540 B mod.	05/23/05 BLF	050523DW1	

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Quality Control Report

Page 4 of 5

QUALITY CONTROL REPORT

KAR Project No. : 052318

Date Reported : 05/25/05

Client: Dragun Corporation

Project Description : Analysis of four soil samples from Morenci (#1004-05).

Sample ID : **Laboratory Method Blank-Soil**

Sampled By :

Date Sampled :

Sample Type : **LMB-soil**

Date Received : 5/23/2005

Time Sampled :

Sample No. : 052318-05

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On By	QC Batch	Comments
Prep. metals	Completed								EPA 30xx,200.x	05/23/05 PML		
Lead, total	<1 mg/kg dry sample								EPA 6010B	05/24/05 DBL	050524APE	

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Quality Control Report

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BATCH QC REPORT

Printed : 2:25:19 PM, 5/25/2005

Test	QC Batch	Date	Concentration (Original)	Spike Conc.	Matrix Spike Conc.	% Rec.	Matrix Spike Duplicate Conc.	% Rec.	Dup. Spikes Rel. % Diff.	Duplicate #1	Duplicate #2	Duplicates Rel. % Diff.	Sample No.
Calcium, dissolved	050524APE	5/24/2005	93.9	40	127	82.7 %	127.3	83.5 %	0.2 %				052171-01
Dry weight solids	050523DW1	5/23/2005	94.87							94.77	94.98	0.2 %	052314-10
Iron, dissolved	050524APE	5/24/2005	14.8	41	53.88	95.8 %	54.1	96.3 %	0.4 %				052171-01
Iron, dissolved	050524APE	5/24/2005	.02	40	38.03	95.0 %	38.45	96.1 %	1.1 %				052180-02
Lead, total	050524APE	5/24/2005	4	41.2278	44.6967	98.7 %							052318-01
Lead, total	050524APE	5/24/2005	5							4.63	4.74	2.5 %	052318-02
Magnesium, dissolved	050524APE	5/24/2005	28	40	65.94	94.8 %	66.08	95.2 %	0.2 %				052171-01
Potassium, dissolved	050524APE	5/24/2005	4.6	40	47.52	107.3 %	47.35	106.9 %	0.4 %				052171-01
Sodium, dissolved	050524APE	5/24/2005	142	40	173.7	79.2 %	173.2	78.0 %	0.3 %				052171-01

This "Batch QC" section of the QC Report contains data from samples analyzed in the same Extraction Batch (analytical run) as the samples that you submitted. Please refer to the previous QC Report section for QC information specific to your samples. This report may only be reproduced in full and not without written consent.

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QC Batch Report

Page 1 of 1

CHAIN OF CUSTODY RECORD

657318

THE DRAGUN CORPORATION 30445 Northwestern Hwy. Suite 260 Farmington Hills, MI 48334 (248) 932-0228 (248) 932-0618 FAX				PROJECT NO. 1004-05		SITE NAME Merend		PAGE 1 OF 1										
SAMPLERS (SIGNATURE) <i>[Signature]</i>				LABORATORY Kar														
STATION NO	DATE	TIME	COMP	GRAB	STATION LOCATION	SAMPLE MEDIA	NO OF CONTAINERS	ANALYSES REQUIRED								REMARKS		
								Total lead **										
1	5-19-05	10:15am		X	V-27	Soil	1	✓									Please send results to:	
2	5-19-05	10:30am		X	V-38	Soil	1	✓									Mr. Allen Griffith, Leontin	
3	5-19-05	10:35am		X	V-29	Soil	1	✓										
4	5-19-05	10:36am		X	V-30	Soil	1	✓									* Standard turn around time	
																	** Total lead only	
																	* Please report soil data on a dry weight basis	
																	* MDEQ Operational memo #1 detection limit	
RELINQUISHED BY <i>[Signature]</i>	DATE/TIME 5-19-05/10:50am	RECEIVED BY <i>[Signature]</i>	RELINQUISHED BY <i>[Signature]</i>	DATE/TIME 5/19/05 14:00	RECEIVED BY <i>[Signature]</i>	RELINQUISHED BY <i>[Signature]</i>	DATE/TIME 5/20/05 10:00	RECEIVED BY City Transfer	RELINQUISHED BY <i>[Signature]</i>	DATE/TIME 5/23/05 1000	RECEIVED BY <i>[Signature]</i>	RELINQUISHED BY <i>[Signature]</i>	DATE/TIME 5/23/05 1000	RECEIVED BY <i>[Signature]</i>	RELINQUISHED BY <i>[Signature]</i>	DATE/TIME 5/23/05 1000	RECEIVED BY <i>[Signature]</i>	RECEIVED FOR LABORATORY BY <i>[Signature]</i>

Dragun Corporation
30445 Northwestern Hwy Ste 260
Farmington Hills, MI 48334

KAR Project No. : 052326
Date Reported : 05/25/05
Date Activated : 05/24/05
Date Due : 05/25/05
Date Validated : 05/25/05

Attn : Mr. Allan Clifford Lawton

Project

Description : Analysis of 10 soil samples from Morenci (#1004-05).


Dear Client,

Your laboratory data is presented to you in this report. Unless otherwise stated under the "Comments" heading, all tests were performed within the maximum allowable holding times, have met or exceeded QC requirements and the result represents the sample as it was received.

If you wish to contact us about this work please mention KAR Project No. 052326. To arrange additional sampling or testing please contact our Client Services Department. If you have a question regarding quality assurance please contact William Rauch.

Thank you for the opportunity to serve you. Please do not hesitate to call if we can provide additional assistance.

Respectfully submitted,



Michael J. Jaeger
Director of Laboratories

POSITIVE RESULTS SUMMARY REPORT

Client: *Dragun Corporation*

KAR Project No.: **052326**

Date Reported: **5/25/2005**

Project

Description: *Analysis of 10 soil samples from Morenci (#1004-05).*

Sample Description: **"V-31"**

Test	Positive Result Concentration	Units
Lead, total	11	mg/kg dry sample

Sample Description: **"V-32"**

Test	Positive Result Concentration	Units
Lead, total	5	mg/kg dry sample

Sample Description: **"V-33"**

Test	Positive Result Concentration	Units
Lead, total	5	mg/kg dry sample

Sample Description: **"V-34"**

Test	Positive Result Concentration	Units
Lead, total	5	mg/kg dry sample

Sample Description: **"V-35"**

Test	Positive Result Concentration	Units
Lead, total	6	mg/kg dry sample

Sample Description: **"V-36"**

Test	Positive Result Concentration	Units
Lead, total	6	mg/kg dry sample

Sample Description: **"V-37"**

Test	Positive Result Concentration	Units
Lead, total	5	mg/kg dry sample

Sample Description: **"V-38"**

Test	Positive Result Concentration	Units
Lead, total	5	mg/kg dry sample

This Positive Results Summary Report provides an overview of the sample set and CONTAINS ONLY RESULTS ABOVE THE REPORTING LIMIT. It should not be used as a substitute for the attached detail report.

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Positive Results Summary Report

Page 1 of 2

POSITIVE RESULTS SUMMARY REPORT

Client: *Dragun Corporation*

KAR Project No.: **052326**

Date Reported: **5/25/2005**

Project

Description: *Analysis of 10 soil samples from Morenci (#1004-05).*

Sample Description: **"V-39"**

Test	Positive Result Concentration	Units
Lead, total	9	mg/kg dry sample

Sample Description: **"V-40"**

Test	Positive Result Concentration	Units
Lead, total	27	mg/kg dry sample

This Positive Results Summary Report provides an overview of the sample set and CONTAINS ONLY RESULTS ABOVE THE REPORTING LIMIT. It should not be used as a substitute for the attached detail report.

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Positive Results Summary Report

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LABORATORY DETAIL REPORT

Client: *Dragun Corporation*

KAR Project No. : **052326**

Date Reported : **05/25/05**

Project

Desc. : *Analysis of 10 soil samples from Morenci (#1004-05).*

Sample ID : **"V-31"**

Sampled By : *CL of Dragun Corporation*

Sample Date : *5/19/2005*

Sample Time : *1405*

Date Received : **5/24/2005**

Sample Type : **soil**

KAR Sample No. : **052326-01**

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep, metals	Completed		EPA 3050	05/24/05	DBL	
Lead, total	11	mg/kg dry sample	EPA 6010B	05/25/05	DBL	
Dry weight solids	87.97	% by weight	SM 2540 B mod.	05/24/05	BLF	

Sample ID : **"V-32"**

Sampled By : *CL of Dragun Corporation*

Sample Date : *5/20/2005*

Sample Time : *0855*

Date Received : **5/24/2005**

Sample Type : **soil**

KAR Sample No. : **052326-02**

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep, metals	Completed		EPA 3050	05/24/05	DBL	
Lead, total	5	mg/kg dry sample	EPA 6010B	05/25/05	DBL	
Dry weight solids	95.02	% by weight	SM 2540 B mod.	05/24/05	BLF	

Sample ID : **"V-33"**

Sampled By : *CL of Dragun Corporation*

Sample Date : *5/20/2005*

Sample Time : *0900*

Date Received : **5/24/2005**

Sample Type : **soil**

KAR Sample No. : **052326-03**

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep, metals	Completed		EPA 3050	05/24/05	DBL	
Lead, total	5	mg/kg dry sample	EPA 6010B	05/25/05	DBL	
Dry weight solids	96.08	% by weight	SM 2540 B mod.	05/24/05	BLF	

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Laboratory Detail Report

Page 1 of 4

LABORATORY DETAIL REPORT

KAR Project No. : 052326

Client: *Dragun Corporation*

Date Reported : 05/25/05

Project

Desc. : *Analysis of 10 soil samples from Morenci (#1004-05).*

Sample ID : **"V-34"**

Sampled By : *CL of Dragun Corporation*

Sample Date : 5/20/2005

Sample Time : 1410

Date Received : 5/24/2005

Sample Type : soil

KAR Sample No. : 052326-04

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep, metals	Completed		EPA 3050	05/24/05	DBL	
Lead, total	5	mg/kg dry sample	EPA 6010B	05/25/05	DBL	
Dry weight solids	88.14	% by weight	SM 2540 B mod.	05/24/05	BLF	

Sample ID : **"V-35"**

Sampled By : *CL of Dragun Corporation*

Sample Date : 5/20/2005

Sample Time : 1415

Date Received : 5/24/2005

Sample Type : soil

KAR Sample No. : 052326-05

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep, metals	Completed		EPA 3050	05/24/05	DBL	
Lead, total	6	mg/kg dry sample	EPA 6010B	05/25/05	DBL	
Dry weight solids	94.05	% by weight	SM 2540 B mod.	05/24/05	BLF	

Sample ID : **"V-36"**

Sampled By : *CL of Dragun Corporation*

Sample Date : 5/20/2005

Sample Time : 1425

Date Received : 5/24/2005

Sample Type : soil

KAR Sample No. : 052326-06

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep, metals	Completed		EPA 3050	05/24/05	DBL	
Lead, total	6	mg/kg dry sample	EPA 6010B	05/25/05	DBL	
Dry weight solids	89.21	% by weight	SM 2540 B mod.	05/24/05	BLF	

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Laboratory Detail Report

Page 2 of 4

LABORATORY DETAIL REPORT

KAR Project No. : 052326

Date Reported : 05/25/05

Client: *Dragun Corporation*

Project

Desc. : *Analysis of 10 soil samples from Morenci (#1004-05).*

Sample ID : **"V-37"**

Sampled By : *CL of Dragun Corporation*

Sample Date : 5/20/2005

Sample Time : 1435

Date Received : 5/24/2005

Sample Type : soil

KAR Sample No. : 052326-07

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep. metals	Completed		EPA 3050	05/24/05	DBL	
Lead, total	5	mg/kg dry sample	EPA 6010B	05/25/05	DBL	
Dry weight solids	91.14	% by weight	SM 2540 B mod.	05/24/05	BLF	

Sample ID : **"V-38"**

Sampled By : *CL of Dragun Corporation*

Sample Date : 5/20/2005

Sample Time : 1442

Date Received : 5/24/2005

Sample Type : soil

KAR Sample No. : 052326-08

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep. metals	Completed		EPA 3050	05/24/05	DBL	
Lead, total	5	mg/kg dry sample	EPA 6010B	05/25/05	DBL	
Dry weight solids	89.35	% by weight	SM 2540 B mod.	05/24/05	BLF	

Sample ID : **"V-39"**

Sampled By : *CL of Dragun Corporation*

Sample Date : 5/20/2005

Sample Time : 1450

Date Received : 5/24/2005

Sample Type : soil

KAR Sample No. : 052326-09

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep. metals	Completed		EPA 3050	05/24/05	DBL	
Lead, total	9	mg/kg dry sample	EPA 6010B	05/25/05	DBL	
Dry weight solids	88.87	% by weight	SM 2540 B mod.	05/24/05	BLF	

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Laboratory Detail Report

Page 3 of 4

LABORATORY DETAIL REPORT

KAR Project No. : 052326

Client: *Dragun Corporation*

Date Reported : 05/25/05

Project

Desc. : *Analysis of 10 soil samples from Morenci (#1004-05).*

Sample ID : **"V-40"**

Sampled By : *CL of Dragun Corporation*

Sample Date : 5/20/2005

Sample Time : 1500

Date Received : 5/24/2005

Sample Type : soil

KAR Sample No. : 052326-10

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep, metals	Completed		EPA 3050	05/24/05	DBL	
Lead, total	27	mg/kg dry sample	EPA 6010B	05/25/05	DBL	
Dry weight solids	89.42	% by weight	SM 2540 B mod.	05/24/05	BLF	

Sample ID : **Laboratory Method Blank-Soil**

Sampled By :

Sample Date :

Sample Time :

Date Received : 5/24/2005

Sample Type : LMB-soil

KAR Sample No. : 052326-11

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep, metals	Completed		EPA 3050	05/24/05	DBL	
Lead, total	<1	mg/kg dry sample	EPA 6010B	05/25/05	DBL	

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Laboratory Detail Report

Page 4 of 4

Dragun Corporation
30445 Northwestern Hwy Ste 260
Farmington Hills, MI 48334

KAR Project No. : 052326
Date Reported : 05/25/05
Date Activated : 05/24/05
Date Due : 05/25/05
Date Validated : 05/25/05

Attn : Mr. Allan Clifford Lawton

Project

Description : Analysis of 10 soil samples from Morenci (#1004-05).

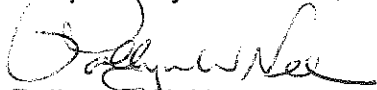
Dear Client,

Please find attached a copy of the QC Report for KAR Project No. 052326. The report might contain a second section entitled "QC Batch Report". This section will contain matrix-specific quality control information for the analytical batch, if applicable. Unless otherwise stated under the "Comments" heading, all tests were performed within the maximum allowable holding times, have met or exceeded QC requirements and the result represents the sample as it was received.

For duplicate sample calculations, concentrations are considered zero if less than or equal to the reporting limit. For spiked sample calculations, original sample concentration is also considered zero if less than or equal to the reporting limit. For general QA/QC procedures please consult the KAR Laboratories Quality Assurance Manual.

I hope that you find our services accurate and complete. Please do not hesitate to call if we can provide additional assistance.

Respectfully submitted,



Pollyann W. Nee
Quality Assurance Manager

KAR Laboratories, Inc.

Quality Control Acceptance Criteria

Soil Matrix

KAR Project 052326

May 25, 2005

Fraction	Analyte	Recovery Range (%)	RPD
Metals	Lead, total	37-176	21

QUALITY CONTROL REPORT

KAR Project No. : 052326

Date Reported : 05/25/05

Client: Dragun Corporation

Project Description : Analysis of 10 soil samples from Morenci (#1004-05).

Sample ID : "V-31"

Sampled By : CL of Dragun Corporation

Date Sampled : 5/19/2005

Sample Type : soil

Date Received : 5/24/2005

Time Sampled : 1405

Sample No. : 052326-01

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On	By	QC Batch	Comments
Prep. metals	Completed								EPA 3050	05/24/05	DBL		
Lead, total	11 mg/kg dry sample	44.06	106.9 %						EPA 6010B	05/25/05	DBL	050525APE	
Dry weight solids	87.97 % by weight								SM 2540 B mod.	05/24/05	BLF	050524DW1	

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Quality Control Report

Page 1 of 11

QUALITY CONTROL REPORT

KAR Project No. : 052326

Date Reported : 05/25/05

Client: Dragun Corporation

Project Description : Analysis of 10 soil samples from Morenci (#1004-05).

Sample ID : "V-32"

Sampled By : CL of Dragun Corporation

Date Sampled : 5/20/2005

Sample Type : soil

Date Received : 5/24/2005

Time Sampled : 0855

Sample No. : 052326-02

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On	By	QC Batch	Comments
Prep. metals	Completed								EPA 3050	05/24/05	OBL		
Lead, total	5 mg/kg dry sample					5.494	4.999	9.4 %	EPA 6010B	05/25/05	OBL	050525APE	
Dry weight solids	95.02 % by weight					95.107	94.928	0.2 %	SM 2540 B mod.	05/24/05	BLF	050524DW1	

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Quality Control Report

Page 2 of 11

QUALITY CONTROL REPORT

KAR Project No. : 052326

Date Reported : 05/25/05

Client: *Dragun Corporation*

Project Description : *Analysis of 10 soil samples from Morenci (#1004-05).*

Sample ID : **"V-33"**

Sampled By : *CL of Dragun Corporation*

Date Sampled : 5/20/2005

Sample Type : *soil*

Date Received : 5/24/2005

Time Sampled : 0900

Sample No. : 052326-03

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On	By	QC Batch	Comments
Prep. metals	Completed								EPA 3050	05/24/05	DBL		
Lead, total	5								EPA 6010B	05/25/05	DBL	050525APE	
Dry weight solids	96.08								SM 2540 B mod.	05/24/05	BLF	050524DW1	

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Quality Control Report

Page 3 of 11

QUALITY CONTROL REPORT

KAR Project No. : 052326

Date Reported : 05/25/05

Client: Dragun Corporation

Project Description : Analysis of 10 soil samples from Morenci (#1004-05).

Sample ID : "V-34"

Sampled By : CL of Dragun Corporation

Date Sampled : 5/20/2005

Sample Type : soil

Date Received : 5/24/2005

Time Sampled : 1410

Sample No. : 052326-04

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On By	QC Batch	Comments
Prep, metals	Completed								EPA 3050	05/24/05 DBL		
Lead, total	5 mg/kg dry sample								EPA 6010B	05/25/05 DBL	050525APE	
Dry weight solids	88.14 % by weight								SM 2540 B mod.	05/24/05 BLF	050524DW1	

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Quality Control Report

Page 4 of 11

QUALITY CONTROL REPORT

KAR Project No. : 052326

Date Reported : 05/25/05

Client: Dragun Corporation

Project Description : Analysis of 10 soil samples from Morenci (#1004-05).

Sample ID : **"V-35"**

Sampled By : CL of Dragun Corporation

Date Sampled : 5/20/2005

Sample Type : soil

Date Received : 5/24/2005

Time Sampled : 1415

Sample No. : 052326-05

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On	By	QC Batch	Comments
Prep. metals	Completed								EPA 3050	05/24/05	DBL		
Lead, total	6 mg/kg dry sample								EPA 6010B	05/25/05	DBL	050525APE	
Dry weight solids	94.05 % by weight								SM 2540 B mod.	05/24/05	BLF	050524DW1	

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Quality Control Report

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QUALITY CONTROL REPORT

KAR Project No. : 052326

Date Reported : 05/25/05

Client: Dragun Corporation

Project Description : Analysis of 10 soil samples from Morenci (#1004-05).

Sample ID : **"V-36"**

Sampled By : CL of Dragun Corporation

Date Sampled : 5/20/2005

Sample Type : soil

Date Received : 5/24/2005

Time Sampled : 1425

Sample No. : 052326-06

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On	By	QC Batch	Comments
Prep. metals	Completed								EPA 3050	05/24/05	DBL		
Lead, total	6								EPA 6010B	05/25/05	DBL	050525APE	
Dry weight solids	89.21								SM 2540 B mod.	05/24/05	BLF	050524DW1	

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Quality Control Report

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QUALITY CONTROL REPORT

KAR Project No. : 052326

Date Reported : 05/25/05

Client: Dragun Corporation

Project Description : Analysis of 10 soil samples from Morenci (#1004-05).

Sample ID : "V-37"

Sampled By : CL of Dragun Corporation

Date Sampled : 5/20/2005

Sample Type : soil

Date Received : 5/24/2005

Time Sampled : 1435

Sample No. : 052326-07

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On	By	QC Batch	Comments
Prep. metals	Completed								EPA 3050	05/24/05	DBL		
Lead, total	5 mg/kg dry sample								EPA 6010B	05/25/05	DBL	050525APE	
Dry weight solids	91.14 % by weight								SM 2540 B mod.	05/24/05	BLF	050524DW1	

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Quality Control Report

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QUALITY CONTROL REPORT

KAR Project No. : 052326

Date Reported : 05/25/05

Client: Dragun Corporation

Project Description : Analysis of 10 soil samples from Morenci (#1004-05).

Sample ID : **"V-38"**

Sampled By : CL of Dragun Corporation

Date Sampled : 5/20/2005

Sample Type : soil

Date Received : 5/24/2005

Time Sampled : 1442

Sample No. : 052326-08

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On	By	QC Batch	Comments
Prep, metals	Completed								EPA 3050	05/24/05	DBL		
Lead, total	5 mg/kg dry sample								EPA 6010B	05/25/05	DBL	050525APE	
Dry weight solids	89.35 % by weight								SM 2540 B mod.	05/24/05	BLF	050524DW1	

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Quality Control Report

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QUALITY CONTROL REPORT

KAR Project No. : 052326

Date Reported : 05/25/05

Client: Dragun Corporation

Project Description : Analysis of 10 soil samples from Morenci (#1004-05).

Sample ID : "V-39"

Sampled By : CL of Dragun Corporation

Date Sampled : 5/20/2005

Sample Type : soil

Date Received : 5/24/2005

Time Sampled : 1450

Sample No. : 052326-09

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On	By	QC Batch	Comments
Prep, metals	Completed								EPA 3050	05/24/05	DBL		
Lead, total	9								EPA 6010B	05/25/05	DBL	050525APE	
Dry weight solids	88.87								SM 2540 B mod.	05/24/05	BLF	050524DW1	

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Quality Control Report

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QUALITY CONTROL REPORT

KAR Project No. : 052326

Date Reported : 05/25/05

Client: Dragun Corporation

Project Description : Analysis of 10 soil samples from Morenci (#1004-05).

Sample ID : **"V-40"**

Sampled By : CL of Dragun Corporation

Date Sampled : 5/20/2005

Sample Type : soil

Date Received : 5/24/2005

Time Sampled : 1500

Sample No. : 052326-10

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On	By	QC Batch	Comments
Prep. metals	Completed								EPA 3050	05/24/05	DBL		
Lead, total	27								EPA 6010B	05/25/05	DBL	050525APE	
Dry weight solids	89.42					89.158	89.68	0.6 %	SM 2540 B mod.	05/24/05	BLF	050524DW1	

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Quality Control Report

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QUALITY CONTROL REPORT

KAR Project No. : 052326

Date Reported : 05/25/05

Client: Dragun Corporation

Project Description : Analysis of 10 soil samples from Morenci (#1004-05).

Sample ID : Laboratory Method Blank-Soil

Sampled By :

Date Sampled :

Sample Type : LMB-soil

Date Received : 5/24/2005

Time Sampled :

Sample No. : 052326-11

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On	By	QC Batch	Comments
Prep. metals	Completed								EPA 3060	05/24/05	DBL		
Lead, total	<1 mg/kg dry sample	40	102.1 %						EPA 6010B	05/25/05	DBL	050525APE	

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Quality Control Report

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BATCH QC REPORT

Printed : 3:04:48 PM, 5/25/2005

Test	QC Batch	Date	Concentration (Original)	Spike Conc.	Matrix Spike Conc.	% Rec.	Matrix Spike Duplicate Conc.	% Rec.	Dup. Spikes Rel. % Diff.	Duplicate #1	Duplicate #2	Duplicates Rel. % Diff.	Sample No.
Dry weight solids	050524DW1	5/24/2005	95.02							95.11	94.93	0.2 %	052326-02
Dry weight solids	050524DW1	5/24/2005	89.42							89.16	89.68	0.6 %	052326-10
Lead, total	050525APE	5/25/2005	11	44.0605	58.088	106.9 %							052326-01
Lead, total	050525APE	5/25/2005	5							5.49	5	9.4 %	052326-02
Lead, total	050525APE	5/25/2005	0	40	40.84	102.1 %							052326-11

This "Batch QC" section of the QC Report contains data from samples analyzed in the same Extraction Batch (analytical run) as the samples that you submitted. Please refer to the previous QC Report section for QC information specific to your samples. This report may only be reproduced in full and not without written consent.

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QC Batch Report

Page 1 of 1

THE DRAGON CORPORATION 30445 Northwestern Hwy. Suite 260 Farmington Hills, MI 48334 (248) 932-0228 (248) 932-0618 FAX				PROJECT NO. 1004-05		SITE NAME Marone.									PAGE 1 OF 1			
				SAMPLERS (SIGNATURE) <i>[Signature]</i>				LABORATORY <i>Kerr.</i>										
STATION NO	DATE	TIME	COMP	GRAB	STATION LOCATION	SAMPLE MEDIA	NO OF CONTAINERS	ANALYSES REQUIRED										REMARKS
								Total Lead & Pb										
1	5-19-05	2:05pm	X	V-31	SOL	1	✓									Please send results to: Allan Clifford Lawton		
2	5-20-05	2:55pm	X	V-32	SOL	1	✓											
3	5-20-05	4:00am	X	V-33	SOL	1	✓									* MDEQ operational memo #1		
4	5-20-05	2:10pm	X	V-34	SOL	1	✓									detection limits.		
5	5-20-05	2:15pm	X	V-35	SOL	1	✓											
6	5-20-05	2:25pm	X	V-36	SOL	1	✓									* Please report all SOL data on a dry weight basis.		
7	5-20-05	2:35pm	X	V-37	SOL	1	✓											
8	5-20-05	2:44pm	X	V-38	SOL	1	✓											
9	5-20-05	2:50pm	X	V-39	SOL	1	✓									** Total Lead only		
10	5-20-05	3:00pm	X	V-40	SOL	1	✓											
																* 43 hr Turn around time.		
RELINQUISHED BY <i>[Signature]</i>			DATE/TIME 5/23/05/10:10am		RECEIVED BY			RELINQUISHED BY			DATE/TIME		RECEIVED BY					
RELINQUISHED BY			DATE/TIME		RECEIVED BY			RELINQUISHED BY			DATE/TIME		RECEIVED BY					
RELINQUISHED BY			DATE/TIME		RECEIVED BY			RELINQUISHED BY			DATE/TIME		RECEIVED FOR LABORATORY BY <i>[Signature]</i>					

[illegible]

Dragun Corporation
30445 Northwestern Hwy Ste 260
Farmington Hills, MI 48334

KAR Project No. : 052363
Date Reported : 05/25/05
Date Activated : 05/24/05
Date Due : 05/25/05
Date Validated : 05/25/05

Attn : Mr. Allan Clifford Lawton

Project

Description : Analysis of one soil sample from Morenci (#1004-05).

Dear Client,

Your laboratory data is presented to you in this report. Unless otherwise stated under the "Comments" heading, all tests were performed within the maximum allowable holding times, have met or exceeded QC requirements and the result represents the sample as it was received.

If you wish to contact us about this work please mention KAR Project No. 052363. To arrange additional sampling or testing please contact our Client Services Department. If you have a question regarding quality assurance please contact William Rauch.

Thank you for the opportunity to serve you. Please do not hesitate to call if we can provide additional assistance.

Respectfully submitted,



Michael J. Jaeger
Director of Laboratories

LABORATORY DETAIL REPORT

KAR Project No. : 052363

Date Reported : 05/25/05

Client: *Dragun Corporation*

Project

Desc. : *Analysis of one soil sample from Morenci (#1004-05).*

Sample ID : **"Waste Soil"**

Sampled By : *CL of Dragun Corporation*

Sample Date : 5/20/2005

Sample Time : 1530

Date Received : 5/24/2005

Sample Type : *soil*

KAR Sample No. : 052363-01

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep, metals	Completed		EPA 30xx, 200.x	05/25/05	DBL	
TCLP extraction	Completed		EPA 1311	05/24/05	PML	
TCLP report	See comment			05/25/05	KKB	This material does not exhibit the Toxicity Characteristic with respect to lead.

Sample ID : **TCLP Leachate of Waste Soil**

Sampled By :

Sample Date :

Sample Time :

Date Received : 5/24/2005

Sample Type : *TCLP*

KAR Sample No. : 052363-01T

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Lead, total, by ICP	<0.25	mg/L	EPA 6010B	05/25/05	DBL	TC regulatory limit is 5.0 mg/L.

Sample ID : **TCLP Leachate Blank**

Sampled By :

Sample Date :

Sample Time :

Date Received : 5/24/2005

Sample Type : *LMB*

KAR Sample No. : 052363-02

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep, metals	Completed		EPA 30xx, 200.x	05/25/05	DBL	
Lead, total, by ICP	<0.25	mg/L	EPA 6010B	05/25/05	DBL	

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Laboratory Detail Report

Page 1 of 1

Dragun Corporation
30445 Northwestern Hwy Ste 260
Farmington Hills, MI 48334

KAR Project No. : 052387
Date Reported : 06/09/05
Date Activated : 05/25/05
Date Due : 06/09/05
Date Validated : 06/09/05

4025 Northwestern Road

Kalamazoo MI 49001

Phone 269-381-9696

Fax 269-381-9696

www.karlabs.com

Attn : Mr. Allan Clifford Lawton

Project

Description : Analysis of six soil samples from Morenci (#1004-05).

Dear Client,

Your laboratory data is presented to you in this report. Unless otherwise stated under the "Comments" heading, all tests were performed within the maximum allowable holding times, have met or exceeded QC requirements and the result represents the sample as it was received.

If you wish to contact us about this work please mention KAR Project No. 052387. To arrange additional sampling or testing please contact our Client Services Department. If you have a question regarding quality assurance please contact William Rauch.

Thank you for the opportunity to serve you. Please do not hesitate to call if we can provide additional assistance.

Respectfully submitted,



Michael J. Jaeger
Director of Laboratories

POSITIVE RESULTS SUMMARY REPORT

Client: *Dragun Corporation*

KAR Project No.: **052387**

Date Reported: **6/9/2005**

Project

Description: *Analysis of six soil samples from Morenci (#1004-05).*

Sample Description: **"BV-28"**

Test	Positive Result Concentration	Units
Lead, total	793	mg/kg dry sample

Sample Description: **"BV-29"**

Test	Positive Result Concentration	Units
Lead, total	698	mg/kg dry sample

Sample Description: **"BV-31"**

Test	Positive Result Concentration	Units
Lead, total	689	mg/kg dry sample

Sample Description: **"BV-32"**

Test	Positive Result Concentration	Units
Lead, total	55.0	mg/kg dry sample

Sample Description: **"BV-33"**

Test	Positive Result Concentration	Units
Lead, total	427	mg/kg dry sample

Sample Description: **"BV-34"**

Test	Positive Result Concentration	Units
Lead, total	18.8	mg/kg dry sample

This Positive Results Summary Report provides an overview of the sample set and CONTAINS ONLY RESULTS ABOVE THE REPORTING LIMIT. It should not be used as a substitute for the attached detail report.

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Positive Results Summary Report

Page 1 of 1

LABORATORY DETAIL REPORT

KAR Project No. : 052387

Client: *Dragun Corporation*

Date Reported : 06/09/05

Project

Desc. : *Analysis of six soil samples from Morenci (#1004-05).*

Sample ID : **"BV-28"**

Sampled By : *CL of Dragun Corporation*

Sample Date : 5/18/2005

Sample Time : 0925

Date Received : 5/24/2005

Sample Type : soil

KAR Sample No. : 052387-01

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep, metals	Completed		EPA 3050	06/03/05	LPV	
Lead, total	793	mg/kg dry sample	EPA 6010B	06/08/05	DBL	Sample is not homogeneous; result is approximate. Four separate sample portions were analyzed. Individual results obtained were 583, 206, 2111, and 273 mg/kg dry sample.
Dry weight solids	75.24	% by weight	SM 2540 B mod.	05/27/05	BLF	

Sample ID : **"BV-29"**

Sampled By : *CL of Dragun Corporation*

Sample Date : 5/18/2005

Sample Time : 1100

Date Received : 5/24/2005

Sample Type : soil

KAR Sample No. : 052387-02

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep, metals	Completed		EPA 3050	06/03/05	LPV	
Lead, total	698	mg/kg dry sample	EPA 6010B	06/08/05	DBL	
Dry weight solids	86.21	% by weight	SM 2540 B mod.	05/27/05	BLF	

Sample ID : **"BV-31"**

Sampled By : *CL of Dragun Corporation*

Sample Date : 5/18/2005

Sample Time : 1240

Date Received : 5/24/2005

Sample Type : soil

KAR Sample No. : 052387-03

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep, metals	Completed		EPA 3050	06/03/05	LPV	
Lead, total	689	mg/kg dry sample	EPA 6010B	06/08/05	DBL	
Dry weight solids	77.99	% by weight	SM 2540 B mod.	05/27/05	BLF	

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Laboratory Detail Report

Page 1 of 3

LABORATORY DETAIL REPORT

KAR Project No. : **052387**

Date Reported : **06/09/05**

Client: **Dragun Corporation**

Project

Desc. : **Analysis of six soil samples from Morenci (#1004-05).**

Sample ID : **"BV-32"**

Sampled By : **CL of Dragun Corporation**

Sample Date : **5/18/2005**

Sample Time : **1320**

Date Received : **5/24/2005**

Sample Type : **soil**

KAR Sample No. : **052387-04**

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep. metals	Completed		EPA 3050	06/03/05	LPV	
Lead, total	55.0	mg/kg dry sample	EPA 6010B	06/08/05	DBL	
Dry weight solids	86.62	% by weight	SM 2540 B mod.	05/27/05	BLF	

Sample ID : **"BV-33"**

Sampled By : **CL of Dragun Corporation**

Sample Date : **5/18/2005**

Sample Time : **1400**

Date Received : **5/24/2005**

Sample Type : **soil**

KAR Sample No. : **052387-05**

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep. metals	Completed		EPA 3050	06/03/05	LPV	
Lead, total	427	mg/kg dry sample	EPA 6010B	06/08/05	DBL	
Dry weight solids	80.90	% by weight	SM 2540 B mod.	05/27/05	BLF	

Sample ID : **"BV-34"**

Sampled By : **CL of Dragun Corporation**

Sample Date : **5/18/2005**

Sample Time : **0750**

Date Received : **5/24/2005**

Sample Type : **soil**

KAR Sample No. : **052387-06**

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep. metals	Completed		EPA 3050	06/03/05	LPV	
Lead, total	18.8	mg/kg dry sample	EPA 6010B	06/08/05	DBL	
Dry weight solids	83.71	% by weight	SM 2540 B mod.	05/27/05	BLF	

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Laboratory Detail Report

Page 2 of 3

LABORATORY DETAIL REPORT

Client: *Dragun Corporation*

KAR Project No. : **052387**

Date Reported : **06/09/05**

Project

Desc. : *Analysis of six soil samples from Morenci (#1004-05).*

Sample ID : **Laboratory Method Blank - Soil**

Sampled By :

Date Received : **5/24/2005**

Sample Date :

Sample Type : **LMB-soil**

Sample Time :

KAR Sample No. : **052387-07**

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep, metals	Completed		EPA 3050	06/03/05	LPV	
Lead, total	<1	mg/kg dry sample	EPA 6010B	06/08/05	DBL	

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Laboratory Detail Report

Page 3 of 3

**Dragun Corporation
30445 Northwestern Hwy Ste 260
Farmington Hills, MI 48334**

**KAR Project No. : 052387
Date Reported : 06/09/05
Date Activated : 05/25/05
Date Due : 06/09/05
Date Validated : 06/09/05**

Attn : Mr. Allan Clifford Lawton

Project

Description : Analysis of six soil samples from Morenci (#1004-05).

Dear Client,

Please find attached a copy of the QC Report for KAR Project No. 052387. The report might contain a second section entitled "QC Batch Report". This section will contain matrix-specific quality control information for the analytical batch, if applicable. Unless otherwise stated under the "Comments" heading, all tests were performed within the maximum allowable holding times, have met or exceeded QC requirements and the result represents the sample as it was received.

For duplicate sample calculations, concentrations are considered zero if less than or equal to the reporting limit. For spiked sample calculations, original sample concentration is also considered zero if less than or equal to the reporting limit. For general QA/QC procedures please consult the KAR Laboratories Quality Assurance Manual.

I hope that you find our services accurate and complete. Please do not hesitate to call if we can provide additional assistance.

Respectfully submitted,



**Pollyann W. Nee
Quality Assurance Manager**

KAR Laboratories, Inc.

Quality Control Acceptance Criteria

KAR Project 052387

June 9, 2005

Fraction	Analyte	Recovery Range (%)	RPD
Metals (soil)	Lead, total	36-173	22

QCcriteria.052387.wpd

QUALITY CONTROL REPORT

KAR Project No. : 052387

Date Reported : 06/09/05

Client: Dragun Corporation

Project Description : Analysis of six soil samples from Morenci (#1004-05).

Sample ID : **"BV-28"**

Sampled By : CL of Dragun Corporation

Date Sampled : 5/18/2005

Sample Type : soil

Date Received : 5/24/2005

Time Sampled : 0925

Sample No. : 052387-01

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On	By	QC Batch	Comments
Prep. metals	Completed								EPA 3050	06/03/05	LPV		
Lead, total	793 mg/kg dry sample								EPA 6010B	06/08/05	DBL	050608APE	Sample is not homogeneous; result is approximate. Four separate sample portions were analyzed. Individual results obtained were 583, 206, 2111, and 273 mg/kg dry sample.
Dry weight solids	75.24 % by weight								SM 2540 B mod.	05/27/05	BLF	050527DW1	

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Quality Control Report

Page 1 of 7

QUALITY CONTROL REPORT

KAR Project No. : 052387

Date Reported : 06/09/05

Client: Dragun Corporation

Project Description : Analysis of six soil samples from Morenci (#1004-05).

Sample ID : **"BV-29"**

Sampled By : CL of Dragun Corporation

Date Sampled : 5/18/2005

Sample Type : soil

Date Received : 5/24/2005

Time Sampled : 1100

Sample No. : 052387-02

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On	By	QC Batch	Comments
Prep. metals	Completed								EPA 3050	06/03/05	LPV		
Lead, total	698 mg/kg dry sample								EPA 6010B	06/08/05	DBL	050608APE	
Dry weight solids	88.21 % by weight								SM 2540 B mod	05/27/05	BLF	050527DW1	

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Quality Control Report

Page 2 of 7

QUALITY CONTROL REPORT

KAR Project No. : 052387

Date Reported : 06/09/05

Client: *Dragun Corporation*

Project Description : *Analysis of six soil samples from Morenci (#1004-05).*

Sample ID : **"BV-31"**

Sampled By : *CL of Dragun Corporation*

Date Sampled : 5/18/2005

Sample Type : *soil*

Date Received : 5/24/2005

Time Sampled : 1240

Sample No. : 052387-03

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On By	QC Batch	Comments
Prep. metals	Completed								EPA 3050	06/03/05 LPV		
Lead, total	889 mg/kg dry sample								EPA 6010B	06/08/05 DBL	050608APE	
Dry weight solids	77.99 % by weight								SM 2540 B mod.	05/27/05 BLF	050527DW1	

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Quality Control Report

Page 3 of 7

QUALITY CONTROL REPORT

Client: *Dragun Corporation*

KAR Project No. : **052387**

Project Description : *Analysis of six soil samples from Morenci (#1004-05).*

Date Reported : **06/09/05**

Sample ID : **"BV-32"**

Sampled By : **CL of Dragun Corporation**

Date Sampled : **5/18/2005**

Sample Type : **soil**

Date Received : **5/24/2005**

Time Sampled : **1320**

Sample No. : **052387-04**

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On By	QC Batch	Comments
Prep. metals	Completed								EPA 3050	06/03/05 LPV		
Lead, total	55.0 mg/kg dry sample								EPA 6010B	06/08/05 DBL	050808APE	
Dry weight solids	86.62 % by weight								SM 2540 B mod.	05/27/05 BLF	050527DW1	

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Quality Control Report

Page 4 of 7

QUALITY CONTROL REPORT

Client: *Dragun Corporation*

Project Description : *Analysis of six soil samples from Morenci (#1004-05).*

KAR Project No. : **052387**

Date Reported : **06/09/05**

Sample ID : **"BV-33"**

Sampled By : **CL of Dragun Corporation**

Date Sampled : **5/18/2005**

Sample Type : **soil**

Date Received : **5/24/2005**

Time Sampled : **1400**

Sample No. : **052387-05**

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On	By	QC Batch	Comments
Prep. metals	Completed								EPA 3050	06/03/05	LPV		
Lead, total	427 mg/kg dry sample								EPA 6010B	06/08/05	DBL	050808APE	
Dry weight solids	80.90 % by weight								SM 2540 B mod.	05/27/05	BLF	050527DW1	

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Quality Control Report

Page 5 of 7

QUALITY CONTROL REPORT

KAR Project No. : 052387

Date Reported : 06/09/05

Client: *Dragun Corporation*

Project Description : *Analysis of six soil samples from Morenci (#1004-05).*

Sample ID : **"BV-34"**

Sampled By : *CL of Dragun Corporation*

Date Sampled : 5/18/2005

Sample Type : *soil*

Date Received : 5/24/2005

Time Sampled : 0750

Sample No. : 052387-06

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On By	QC Batch	Comments
Prep. metals	Completed								EPA 3050	06/03/05 LPV		
Lead, total	18.8 mg/kg dry sample								EPA 6010B	06/08/05 DBL	050608APE	
Dry weight solids	83.71 % by weight					83.801	83.622	0.2 %	SM 2540 B mod.	05/27/05 BLF	050527DW1	

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Quality Control Report

Page 6 of 7

QUALITY CONTROL REPORT

KAR Project No. : 052387

Date Reported : 06/09/05

Client: Dragun Corporation

Project Description : Analysis of six soil samples from Morenci (#1004-05).

Sample ID : Laboratory Method Blank - Soil

Sampled By :

Date Sampled :

Sample Type : LMB-soil

Date Received : 5/24/2005

Time Sampled :

Sample No. : 052387-07

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On	By	QC Batch	Comments
Prep. metals	Completed								EPA 3050	06/03/05	LPV		
Lead, total	<1 mg/kg dry sample								EPA 6010B	06/08/05	DBL	050808APE	

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Quality Control Report

Page 7 of 7

BATCH QC REPORT

Printed : 4:32:22 PM, 6/9/2005

Test	QC Batch	Date	Concentration (Original)	Spike Conc.	Matrix Spike Conc.	% Rec.	Matrix Spike Duplicate Conc.	% Rec.	Dup. Spikes Rel. % Diff.	Duplicate #1	Duplicate #2	Duplicates Rel. % Diff.	Sample No.
Cadmium, total	050608APE	6/8/2005	0	20	20.48	102.4 %							052514-01
Cadmium, total	050608APE	6/8/2005	0							0	0		052523-01
Chromium, total	050608APE	6/8/2005	0	100	98	98.0 %							052514-01
Chromium, total	050608APE	6/8/2005	0							0	0		052523-01
Copper, total	050608APE	6/8/2005	147	217.3838	403.7694	118.1 %							052390-03
Copper, total	050608APE	6/8/2005	0	100	96	96.0 %							052514-01
Copper, total	050608APE	6/8/2005	0							0	0		052523-01
Dry weight solids	050527DW1	5/27/2005	83.71							83.8	83.62	0.2 %	052387-06
Lead, coarse fraction	050608APE	6/8/2005	102							100	105	4.9 %	052390-02
Lead, coarse fraction	050608APE	6/8/2005	188							185	191	3.2 %	052391-04
Lead, coarse fraction	050608APE	6/8/2005	174							183	165	10.3 %	052391-08
Lead, fine fraction	050608APE	6/8/2005	522							539	504	6.7 %	052390-02
Lead, fine fraction	050608APE	6/8/2005	388							407	368	10.1 %	052391-04
Lead, fine fraction	050608APE	6/8/2005	326							338	313	7.7 %	052391-08
Lead, total, by ICP	050608APE	6/8/2005	48	100	136	88.0 %							052514-01
Lead, total, by ICP	050608APE	6/8/2005	0							0	0		052523-01
Nickel, total	050608APE	6/8/2005	0	100	91	91.0 %							052514-01
Nickel, total	050608APE	6/8/2005	0							0	0		052523-01
Silver, total	050608APE	6/8/2005	0	100	93	93.0 %							052514-01
Silver, total	050608APE	6/8/2005	0							0	0		052523-01
Zinc, total	050608APE	6/8/2005	54	500	555	100.2 %							052514-01
Zinc, total	050608APE	6/8/2005	.04							.04	.04	15.8 %	052523-01

This "Batch QC" section of the QC Report contains data from samples analyzed in the same Extraction Batch (analytical run) as the samples that you submitted. Please refer to the previous QC Report section for QC information specific to your samples. This report may only be reproduced in full and not without written consent.

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QC Batch Report

Page 1 of 1

AIN OF CUSTODY RECORD

THE DRAGON CORPORATION 30445 Northwestern Hwy. Suite 260 Farmington Hills, MI 48334 (248) 932-0228 (248) 932-0618 FAX			PROJECT NO. <u>1004-05</u>		SITE NAME <u>Marenci</u>			
			SAMPLERS (SIGNATURE) <u>Cliff Land</u>		LABORATORY <u>Ka-</u>		PAGE <u>1</u> OF <u>1</u>	

STATION NO	DATE	TIME	C O M P	G R A B	STATION LOCATION	SAMPLE MEDIA	NO OF CONTAINERS	ANALYSES REQUIRED										REMARKS
								Total lead **										
1	5-18-05	9:25am		✓	BV-28	Soil	1	✓										Please send results to: Allan Clifford Lawton
2	5-18-05	11:00am		✓	BV-29	Soil	1	✓										
3	5-18-05	12:40pm		✓	BV-31	Soil	1	✓										* MDEQ Operational Memo #1
4	5-19-05	1:20pm		✓	BV-32	Soil	1	✓										detection limits
5	5-19-05	2:00pm		✓	BV-33	Soil	1	✓										
6	5-20-05	7:50am		✓	BV-34	Soil	1	✓										* please report all soil data on a dry weight basis
																		* Total lead only
																		** Hold All Samples

RELINQUISHED BY <u>Cliff Land</u>	DATE/TIME <u>5-23-05 / 10:13am</u>	RECEIVED BY	RELINQUISHED BY	DATE/TIME	RECEIVED BY
RELINQUISHED BY	DATE/TIME	RECEIVED BY	RELINQUISHED BY	DATE/TIME	RECEIVED BY
RELINQUISHED BY	DATE/TIME	RECEIVED BY	RELINQUISHED BY	DATE/TIME <u>5/24/05 @ 1025</u>	RECEIVED FOR LABORATORY BY <u>Ka- Spencer</u>

APPENDIX
C

APPENDIX C

LABORATORY DAA SHEETS
WASTE CHARACTERIZATION

Dragun Corporation
30445 Northwestern Hwy Ste 260
Farmington Hills, MI 48334

KAR Project No. : 052363
Date Reported : 05/25/05
Date Activated : 05/24/05
Date Due : 05/25/05
Date Validated : 05/25/05

Attn : Mr. Allan Clifford Lawton

Project
Description : Analysis of one soil sample from Morenci (#1004-05).

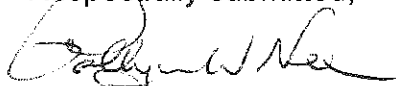
Dear Client,

Please find attached a copy of the QC Report for KAR Project No. 052363. The report might contain a second section entitled "QC Batch Report". This section will contain matrix-specific quality control information for the analytical batch, if applicable. Unless otherwise stated under the "Comments" heading, all tests were performed within the maximum allowable holding times, have met or exceeded QC requirements and the result represents the sample as it was received.

For duplicate sample calculations, concentrations are considered zero if less than or equal to the reporting limit. For spiked sample calculations, original sample concentration is also considered zero if less than or equal to the reporting limit. For general QA/QC procedures please consult the KAR Laboratories Quality Assurance Manual.

I hope that you find our services accurate and complete. Please do not hesitate to call if we can provide additional assistance.

Respectfully submitted,



Pollyann W. Nee
Quality Assurance Manager

KAR Laboratories, Inc.

Quality Control Acceptance Criteria

Aqueous Matrix

KAR Project 052363

May 25, 2005

Fraction	Analyte	Recovery Range (%)	RPD
Metals	Lead, total	77-122	20

QUALITY CONTROL REPORT

KAR Project No. : 052363

Date Reported : 05/25/05

Client: Dragun Corporation

Project Description : Analysis of one soil sample from Morenci (#1004-05).

Sample ID : **"Waste Soil"**

Sampled By : CL of Dragun Corporation

Date Sampled : 5/20/2005

Sample Type : soil

Date Received : 5/24/2005

Time Sampled : 1530

Sample No. : 052363-01

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On By	QC Batch	Comments
Prep. metals	Completed								EPA 30xx,200.x	05/25/05 DBL		
TCLP extraction	Completed								EPA 1311	05/24/05 PML		
TCLP report	See comment									05/25/05 KKB		This material does not exhibit the Toxicity Characteristic with respect to lead.

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Quality Control Report

Page 1 of 3

QUALITY CONTROL REPORT

KAR Project No. : 052363

Date Reported : 05/25/05

Client: *Dragun Corporation*

Project Description : *Analysis of one soil sample from Morenci (#1004-05).*

Sample ID : **TCLP Leachate of Waste Soil**

Sampled By :

Date Sampled :

Sample Type : **TCLP**

Date Received : **5/24/2005**

Time Sampled :

Sample No. : **052363-01T**

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On By	QC Batch	Comments
Lead, total, by ICP	<0.25 mg/L								EPA 6010B	05/25/05 DBL	050525APE	TC regulatory limit is 5.0 mg/L

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Quality Control Report

Page 2 of 3

QUALITY CONTROL REPORT

KAR Project No. : **052363**

Date Reported : **05/25/05**

Client: *Dragun Corporation*

Project Description : *Analysis of one soil sample from Morenci (#1004-05).*

Sample ID : **TCLP Leachate Blank**

Sampled By :

Date Sampled :

Sample Type : **LMB**

Date Received : **5/24/2005**

Time Sampled :

Sample No. : **052363-02**

Test	Result	Spike Level	MS% Rec.	MSD% Rec.	Rel. % Diff.	Dupl. #1	Dupl. #2	Rel. % Diff.	Method	Analyzed On	By	QC Batch	Comments
Prep. metals	Completed								EPA 30xx, 200.x	05/25/05	DBL		
Lead, total, by ICP	<0.25 mg/L								EPA 6010B	05/25/05	DBL	050525APE	

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Quality Control Report

Page 3 of 3

BATCH QC REPORT

Printed : 3:25:23 PM, 5/25/2005

Test	QC Batch	Date	Concentration (Original)	Spike Conc.	Matrix Spike Conc.	% Rec.	Matrix Spike Duplicate Conc.	% Rec.	Dup. Spikes Rel. % Diff.	Duplicate #1	Duplicate #2	Duplicates Rel. % Diff.	Sample No.
Arsenic, total, by ICP	050525APE	5/25/2005	0	0.5	0.463	92.6 %							052268-01T
Barium, total	050525APE	5/25/2005	0	0.5	0.484	96.8 %							052268-01T
Cadmium, total	050525APE	5/25/2005	0	0.1	0.114	114.0 %							052268-01T
Chromium, total	050525APE	5/25/2005	0	0.5	0.451	90.2 %							052268-01T
Lead, total	050525APE	5/25/2005	11	44.0605	58.088	106.9 %							052326-01
Lead, total	050525APE	5/25/2005	5							5.49	5	9.4 %	052326-02
Lead, total	050525APE	5/25/2005	0	40	40.84	102.1 %							052326-11
Lead, total, by ICP	050525APE	5/25/2005	.1	0.5	0.591	98.4 %							052268-01T
Manganese, dissolved	050525APE	5/25/2005	1.05	1	2.027	97.7 %	2.04	99.0 %	0.6 %				052171-01
Selenium, total, by ICP	050525APE	5/25/2005	0	0.5	0.456	91.2 %							052268-01T
Silver, total	050525APE	5/25/2005	0	0.5	0.445	89.0 %							052268-01T

This "Batch QC" section of the QC Report contains data from samples analyzed in the same Extraction Batch (analytical run) as the samples that you submitted. Please refer to the previous QC Report section for QC information specific to your samples. This report may only be reproduced in full and not without written consent.

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QC Batch Report
Page 1 of 1

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APPENDIX D

SOIL TRANSPORTATION AND DISPOSAL DOCUMENTATION



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011811

Section I

GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corporation
c. Address: 322 W. Main St.
Morenci, MI 49256
e. Phone No.: 248-589-4830

b. Generating Location: _____
d. Address: Same
f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____
h. WASTE CODE MI - 687 - 060526 - ah 2927 - 515
j. Description of Waste C-SOIL

h. Owner's Phone No.: _____
k. Quantity 41.23 Units Type TR

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Generator Authorized Agent Name

Signature

Shipment Date

Section II

TRANSPORTER

TRANSPORTER I

a. Name: Zander Trucking
b. Address: 5000 W. Main St.
Ann Arbor, MI 48106
c. Driver Name/Title: Janie Farmer
PRINT/TYPE
d. Phone No.: _____ e. Truck No.: 88
f. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

g. Driver Signature

Shipment Date

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
PRINT/TYPE
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. Driver Signature

Shipment Date

Section III

DESTINATION

a. Site Name: Arbor Hills Landfill
b. Physical Address: 10690 W. 6 Mile Rd.
Northville, MI 48167
e. TICKET No.: _____

c. Phone No.: 248-449-1886
d. Mailing Address: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

i. Name of Authorized Agent

Signature

Receipt Date

DESTINATION RETAIN

510182



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011812

GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp.
b. Address: 322 W. Main St.
Dorenci, MI 49256
c. Phone No.: 248-589-4830

d. Generating Location: _____
e. Address: Same
f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____
h. Owner's Phone No.: _____
i. WASTE CODE M1 - 687 - 060526 - ah 2927 - 515
j. Description of Waste C - Soil

k. Quantity 28.78 Units Type TR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, If the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

Generator Authorized Agent Name

Signature

Shipment Date

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Section II**TRANSPORTER****TRANSPORTER I**

Name: LTD Trucking
Address: 50966 Korte
Belleville MI 48111
Driver Name/Title: John Willoughby
734 4877140
Phone No.: 734 4877140 e. Truck No.: 37
Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

j. Driver Signature [Signature] Shipment Date 05/31/05

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. Driver Signature _____ Shipment Date _____

Section III**DESTINATION**

a. Site Name: Arbor Hills Landfill
b. Physical Address: 10690 W. 6 mile
Northville, MI 48167
e. TICKET No.: _____

c. Phone No.: 248-449-1886
d. Mailing Address: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. Name of Authorized Agent Tim Atkinson Signature [Signature]

Receipt Date 5/31/05

DESTINATION RETAIN

509628



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011813

Section I GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp. b. Generating Location: _____
c. Address: 322 W. Main St. d. Address: _____
Morenci, MI 49256 Same
e. Phone No.: 248-589-4830 f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____ h. Owner's Phone No.: _____
h. WASTE CODE MI - 687-060526 - dh2927 - 515
j. Description of Waste C - Soil k. Quantity 50.22 Units Y Type TR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations. AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

UNITS

P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Generator Authorized Agent Name

Signature

Shipment Date

Section II TRANSPORTER

TRANSPORTER I

a. Name: Ted Market
b. Address: 7401 Parkview Dr
Rolling Hills Mich 48111
c. Driver Name/Title: Ted Market
d. Phone No.: 734-455-1740 e. Truck No.: 184
f. Vehicle License No./State: RT 7437

Acknowledgment of Receipt of Materials:

g. [Signature] 05/31/05
Driver Signature Shipment Date

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____ 05/31/05
Driver Signature Shipment Date

Section III DESTINATION

a. Site Name: Arbor Hills Landfill c. Phone No.: 248-449-1886
b. Physical Address: 10690 W. 6 Mile d. Mailing Address: _____
Northville, MI 48167
e. TICKET No.: A509646

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. [Signature] 05/31/05
Name of Authorized Agent Signature Receipt Date

DESTINATION RETAIN



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011814

Section I

GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp.
b. Generating Location: _____
c. Address: 322 W. Main St.
d. Address: _____
Morenci, MI 49256
e. Phone No.: 248-589-4830
f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____
h. Owner's Phone No.: _____
h. WASTE CODE M1 - 687 - 060524 - ah 2927 - 515
j. Description of Waste C - Soil
k. Quantity 33.98 Units Type Y TR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Generator Authorized Agent Name

Signature

Shipment Date

Section II

TRANSPORTER

TRANSPORTER I

a. Name: Farmer Underwood
b. Address: 7401 BAYVIEWVILLE
Bellefonte Mich 49311
c. Driver Name/Title: G. Bensall DRIVER
d. Phone No.: 2344831740 e. Truck No.: 144
f. Vehicle License No./State: 5249 BA MI

Acknowledgment of Receipt of Materials:

Driver Signature

Shipment Date

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

Driver Signature

Shipment Date

Section III

DESTINATION

a. Site Name: Arbor Hills Landfill
b. Physical Address: 10690 W. 6 mile
Northville, MI 48167
c. Phone No.: 248-449-1886
d. Mailing Address: _____
e. TICKET No.: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

Name of Authorized Agent

Signature

Receipt Date

DESTINATION RETAIN

509460



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011815

Section I GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp. b. Generating Location: _____
c. Address: 322 W. Main St. d. Address: _____
Morenci, MI 49256 Same
e. Phone No.: 248-589-4830 f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____ h. Owner's Phone No.: _____
i. WASTE CODE M1 - 687-060526 - ah 2927 - 515
j. Description of Waste C - Soil k. Quantity 27.33 Units Type TR

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

Generator Authorized Agent Name [Signature] Signature [Signature] Shipment Date 05/31/05

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Section II TRANSPORTER

TRANSPORTER I

a. Name: W.D. Trucking
b. Address: 50944 W. 11th
Bellville, Mich 48111
c. Driver Name/Title: B. W. W. PRINT/TITLE
d. Phone No.: 734-487-7140 e. Truck No.: 94
f. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

g. [Signature] Shipment Date 05/31/05

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____ PRINT/TITLE
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____ Shipment Date _____

Section III DESTINATION

a. Site Name: Arbor Hills Landfill c. Phone No.: 248-449-1886
b. Physical Address: 10690 W. 6 Mile d. Mailing Address: _____
Northville, MI 48167
e. TICKET No.: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. Jim Atchison [Signature] Receipt Date 5/31/05
Name of Authorized Agent Signature

DESTINATION RETAIN

509440



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011816

Section I

GENERATOR (Generator completes all of Section I)

- a. Generator Name: Henkel Corp. b. Generating Location: _____
- c. Address: 322 W. Main St. d. Address: Same
- Morenci, MI 49256
- e. Phone No.: 248-589-4830 f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

- g. Owner's Name: _____ h. Owner's Phone No.: _____
- h. WASTE CODE MI - 687 - 060526 - ah 2927 - 515
- j. Description of Waste C - Soil k. Quantity 3804 Units Y Type TR

TYPE

DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

UNITS

P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Generator Authorized Agent Name

Signature

Shipment Date

Section II

TRANSPORTER**TRANSPORTER I**

- a. Name: Sammy Carter
- b. Address: 7401 Bay Viewville
Bellville, MO
- c. Driver Name/Title: _____ PRINT/TITLE
- d. Phone No.: _____ e. Truck No.: 145
- f. Vehicle License No./State: 9756 AM

Acknowledgment of Receipt of Materials:

g. [Signature] 05/31/05
Driver Signature Shipment Date

TRANSPORTER II

- h. Name: _____
- i. Address: _____
- j. Driver Name/Title: _____ PRINT/TITLE
- k. Phone No.: _____ l. Truck No.: _____
- m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____ 05/31/05
Driver Signature Shipment Date

Section III

DESTINATION

- a. Site Name: Arbor Hills Landfill c. Phone No.: 248-449-1886
- b. Physical Address: 10690 W. 6 Mile d. Mailing Address: _____
Northville, MI 48167
- e. TICKET No.: A509696

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. [Signature] [Signature] 05/31/05
Name of Authorized Agent Signature Receipt Date

DESTINATION RETAIN



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011817

Section I GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp. b. Generating Location: _____
c. Address: 322 W. Main St. d. Address: Same
Morenci, MI 49256
e. Phone No.: 248-589-4830 f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____ h. Owner's Phone No.: _____
i. WASTE CODE M1 - 687 - 060526 - ah 2927 - 515
j. Description of Waste C - Soil k. Quantity 3/22 Units Y Type TR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

[Signature]
Generator Authorized Agent Name

[Signature]
Signature

05/21/05
Shipment Date

Section II TRANSPORTER

TRANSPORTER I

a. Name: LAD Trucking
b. Address: 50966 W. 1st
Ballville Mich
c. Driver Name/Title: _____
d. Phone No.: 248-483-7140 e. Truck No.: 237
f. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

g. [Signature] 05/21/05
Driver Signature Shipment Date

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____ 05/21/05
Driver Signature Shipment Date

Section III DESTINATION

a. Site Name: Arbor Hills Landfill c. Phone No.: 248-449-1886
b. Physical Address: 10690 W. 6 mile d. Mailing Address: _____
Northville, MI 48167

e. TICKET No.: A509698
I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. [Signature] 05/21/05
Name of Authorized Agent Signature Receipt Date

DESTINATION RETAIN



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011818

Section I GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp
c. Address: 322 W. Main St.
Morenci, MI 49256
e. Phone No.: 248-589-4830

b. Generating Location: _____
d. Address: Same
f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____

h. Owner's Phone No.: _____

h. WASTE CODE M1 - 687 - 060526 - 4h 2927 - 515

j. Description of Waste C - Soil

k. Quantity 2989 Units Y Type TR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Generator Authorized Agent Name

Signature

Shipment Date

Section II TRANSPORTER

TRANSPORTER I

a. Name: Fanner, Christopher
b. Address: 7401 Baysideville
Baltimore, MD
c. Driver Name/Title: Mike Stasi
PRINT/TITLE
d. Phone No.: 744-435-1742 e. Truck No.: 153
f. Vehicle License No./State: 02-603

Acknowledgment of Receipt of Materials:

g. Mike Stasi 05/01/05
Driver Signature Shipment Date

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
PRINT/TITLE
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____
Driver Signature Shipment Date

Section III DESTINATION

a. Site Name: Arbor Hills Landfill
b. Physical Address: 10690 W. 6 Mile
Northville, MI 48167

c. Phone No.: 248-449-1886
d. Mailing Address: _____

e. TICKET No.: A509713

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. Name of Authorized Agent

Signature

Receipt Date

DESTINATION RETAIN



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011819

Section I

GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp. b. Generating Location: _____
c. Address: 322 W. Main St. d. Address: Same
Morenci, MI 48856
e. Phone No.: 248-589-4830 f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____ h. Owner's Phone No.: _____
h. WASTE CODE MI - 687 - 060526 - ah 2927 - 515
j. Description of Waste C - Soil k. Quantity 3139 Units Y Type TR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

Greg Holmes
Generator Authorized Agent Name

Signature

Shipment Date

UNITS

P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Section II

TRANSPORTER**TRANSPORTER I**

a. Name: Zachary Trucking
b. Address: 5946 W. 1st St.
Bellville, MO 63147
c. Driver Name/Title: _____
d. Phone No.: 734-481-7140 e. Truck No.: 88
f. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

g. Driver Signature

Shipment Date

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. Driver Signature

Shipment Date

Section III

DESTINATION

a. Site Name: Arbor Hills Landfill c. Phone No.: 248-449-1886
b. Physical Address: 10690 W. 6 Mile d. Mailing Address: _____
Northville, MI 48167
e. TICKET No.: A509694

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. Name of Authorized Agent

Signature

Receipt Date

DESTINATION RETAIN



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011820

Section I GENERATOR (Generator completes all of Section I)

- a. Generator Name: Henkel Corp. b. Generating Location: _____
- c. Address: 322 W Main St. d. Address: Same
- Morenci, MI 49256
- e. Phone No.: 248-589-4830 f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

- g. Owner's Name: _____ h. Owner's Phone No.: _____
- i. WASTE CODE MI - 687 - 060526 - ah 2927 - 515
- j. Description of Waste C-Soil k. Quantity 45 Units Y Type TR

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations. AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DE - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

32.36 TON
UNITS

P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Generator Authorized Agent Name

Signature

Shipment Date

Section II TRANSPORTER

TRANSPORTER I

- a. Name: Bill Wilder
- b. Address: 30944 W. Main St.
- Eastville, MI 49829
- c. Driver Name/Title: Bill Wilder PRINT/TITLE
- d. Phone No.: _____ e. Truck No.: 34
- f. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

- g. Bill Wilder Shipment Date 05/01/05
- Driver Signature

TRANSPORTER II

- h. Name: _____
- i. Address: _____
- j. Driver Name/Title: _____ PRINT/TITLE
- k. Phone No.: _____ l. Truck No.: _____
- m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

- n. _____ Shipment Date _____
- Driver Signature

Section III DESTINATION

- a. Site Name: Arbor Hills Landfill c. Phone No.: 248-449-1886
- b. Physical Address: 10690 W. 6 mile d. Mailing Address: _____
- Northville, MI 48167 509715
- e. TICKET No.: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

- f. NATHAN M. Farland Signature 05/01/05 Receipt Date
- Name of Authorized Agent

DESTINATION RETAIN



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011821

Section I GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp. b. Generating Location: _____
c. Address: 322 W. Main St. d. Address: Same
Morenci, MI 49256
e. Phone No.: 248-589-4830 f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____ h. Owner's Phone No.: _____
h. WASTE CODE M1 - 687 - 060526 - ah 2927 - 515
j. Description of Waste C - Soil k. Quantity 40 Units N Type FIR

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations. AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DE - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Generator Authorized Agent Name

Signature

Shipment Date

Section II TRANSPORTER

TRANSPORTER I

a. Name: Farmer Underwood
b. Address: 7401 Bowerman Rd
Bullitt, Mich
c. Driver Name/Title: G. Bensall
d. Phone No.: 734-485-1740 e. Truck No.: 1424
f. Vehicle License No./State: SZ49BA

Acknowledgment of Receipt of Materials:

g. G. Bensall Shipment Date 05/31/05

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____ Shipment Date _____

Section III DESTINATION

a. Site Name: Arbor Hills Landfill c. Phone No.: 248-449-1886
b. Physical Address: 10690 W. 6 Mile d. Mailing Address: _____
Northville, MI 48167
e. TICKET No.: 509722

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. KATHY McFarland Signature KM Receipt Date 05/31/05

DESTINATION RETAIN



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011822

Section I

GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp. b. Generating Location: _____
c. Address: 322 W. Main St. d. Address: Same
Morenci, MI 49256
e. Phone No.: 248-589-4830 f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____ h. Owner's Phone No.: _____
h. WASTE CODE M1 - 687 - 060526 - ah 2927 - 515
j. Description of Waste C - Soil k. Quantity 3409 Units Y Type TR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, If the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Generator Authorized Agent Name

Signature

Shipment Date

Section II

TRANSPORTER**TRANSPORTER I**

a. Name: James Chabrow
b. Address: 1401 Bannockville
Bellville, Mich
c. Driver Name/Title: _____ PRINT/TYPE
d. Phone No.: _____ e. Truck No.: 155
f. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

g. Phillip Pans 05/31/05
Driver Signature Shipment Date

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____ PRINT/TYPE
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____ 05/31/05
Driver Signature Shipment Date

Section III

DESTINATION

a. Site Name: Arbor Hills Landfill c. Phone No.: 248-449-1886
b. Physical Address: 10690 W. 6 mile d. Mailing Address: _____
Northville, MI 48167
e. TICKET No.: A509732

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. Name of Authorized Agent

Signature

Receipt Date

DESTINATION RETAIN



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011823

Section I GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp. b. Generating Location: _____
c. Address: 322 W. Main St. d. Address: Same
Morenci, MI 49256
e. Phone No.: 248-589-4830 f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____ h. Owner's Phone No.: _____
h. WASTE CODE M1 - 687 - 060526 - ah 2927 - 515
j. Description of Waste C-Soil k. Quantity 2983 Units Y Type TR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Generator Authorized Agent Name [Signature]Signature [Signature]Shipment Date 05/31/05**Section II TRANSPORTER****TRANSPORTER I**

a. Name: Farmers Underwood
b. Address: 7401 Raysonville
Belleville, MO
c. Driver Name/Title: _____
d. Phone No.: _____ e. Truck No.: 150
f. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

g. A. Savant 05/31/05
Driver Signature Shipment Date

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____ 05/31/05
Driver Signature Shipment Date

Section III DESTINATION

a. Site Name: Arbor Hills Landfill c. Phone No.: 248-449-1886
b. Physical Address: 10690 W. 6 Mile d. Mailing Address: _____
Northville, MI 48167
e. TICKET No.: A507749

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. Mike Goulet [Signature] 05/31/05
Name of Authorized Agent Signature Receipt Date

DESTINATION RETAIN



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011824

Section I GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp. b. Generating Location: _____
c. Address: 322 W. Main St. d. Address: _____
Morenci, MI 49256
e. Phone No.: 248-589-4830 f. Phone No.: Same

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____ h. Owner's Phone No.: _____
h. WASTE CODE M1 - 687 - 060526 - ah 2927 - 515
j. Description of Waste C - Soil k. Quantity 36.74 Units Y Type JR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

UNITS

P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Generator Authorized Agent Name

Signature

Shipment Date

Section II TRANSPORTER

TRANSPORTER I

a. Name: Farmer (Harden)
b. Address: 7101 Bayviewville
Bellville, Mich 48101
c. Driver Name/Title: _____
d. Phone No.: _____ e. Truck No.: 150
f. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

g. A. Swad 053105
Driver Signature Shipment Date

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____
Driver Signature Shipment Date

Section III DESTINATION

a. Site Name: Arbor Hills Landfill c. Phone No.: 248-449-1886
b. Physical Address: 10690 W. 6 mile d. Mailing Address: _____
Northville, MI 48167
e. TICKET No.: A509897

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

Name of Authorized Agent

Signature

Receipt Date

DESTINATION RETAIN



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011825

Section I GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp. b. Generating Location: _____
c. Address: 322 W. Main St. d. Address: Same
Morenci, MI 49256
e. Phone No.: 248-589-4830 f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____ h. Owner's Phone No.: _____
h. WASTE CODE M1 - 687 - 060526 - ah 2927 - 515
j. Description of Waste C - Soil k. Quantity 40.50 Units Type Y TR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Generator Authorized Agent Name Greg Holmes Signature [Signature] Shipment Date 053105

Section II TRANSPORTER

TRANSPORTER I

a. Name: L & D Trucking
b. Address: 50946 W. Main St.
Deerfield Mich 49741
c. Driver Name/Title: Bill Wilder PRINT/TITLE
d. Phone No.: _____ e. Truck No.: 34
f. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

g. [Signature] Shipment Date 053105

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____ PRINT/TITLE
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____ Shipment Date _____

Section III DESTINATION

a. Site Name: Arbor Hills Landfill c. Phone No.: 248-449-1886
b. Physical Address: 10690 W. 6 mile
Northville, MI 48167 d. Mailing Address: _____
e. TICKET No.: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. Jim Atchison Signature [Signature] Receipt Date 05-1-05
Name of Authorized Agent

DESTINATION RETAIN

509892



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011826

Section I

GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp.
c. Address: 322 W. Main St.
Morenci, MI 49256
e. Phone No.: 248-589-4830

b. Generating Location: _____
d. Address: Same
f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____
h. WASTE CODE MI - 687 - 060526 - 472927 - 515
j. Description of Waste C - Soil

h. Owner's Phone No.: _____

k. Quantity 47.59 Units Type TR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

Greg Holmes
Generator Authorized Agent Name

Signature

053105
Shipment Date

UNITS

P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Section II

TRANSPORTER

TRANSPORTER I

a. Name: Farmer Enterprises
b. Address: 7400 Beavertonville
Beavertonville Michigan
c. Driver Name/Title: _____
d. Phone No.: 3344857140 e. Truck No.: 195
f. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

g. [Signature] 053105
Driver Signature Shipment Date

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____
Driver Signature Shipment Date

Section III

DESTINATION

a. Site Name: Arbor Hills Landfill
b. Physical Address: 10690 W. 6 mile
Northville, MI 48167
e. TICKET No.: _____

c. Phone No.: 248-449-1886
d. Mailing Address: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. Jim Atchison [Signature]
Name of Authorized Agent Signature

6-1-05
Receipt Date

DESTINATION RETAIN

509884



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011827

Section I GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp. b. Generating Location: _____
c. Address: 322 W. Main St. d. Address: _____
Morenci, MI 49256 Same
e. Phone No.: 248-589-4830 f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____ h. Owner's Phone No.: _____
i. WASTE CODE MI - 687 - 060526 - ah 2927 - 515
j. Description of Waste C. Soil k. Quantity 34.90 Units Y Type TR

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Generator Authorized Agent Name

Signature

Shipment Date

Section II TRANSPORTER

TRANSPORTER I

a. Name: LTD Trucking
b. Address: 3940 W. Main St.
Eastland, Mich
c. Driver Name/Title: _____
d. Phone No.: _____ e. Truck No.: 87
f. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

g. Driver Signature [Signature] h. Shipment Date 06/10/05

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. Driver Signature _____ o. Shipment Date _____

Section III DESTINATION

a. Site Name: Arbor Hills Landfill c. Phone No.: 248-449-1886
b. Physical Address: 10690 W. 6 Mile d. Mailing Address: _____
Northville, MI 48167
e. TICKET No.: A509880

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. Name of Authorized Agent Mike Gannon Signature [Signature] g. Receipt Date 06/10/05

DESTINATION RETAIN



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011828

Section I

GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp.
c. Address: 322 W. Main St.
Morenci MI 49256
e. Phone No.: 248-589-4830

b. Generating Location: _____
d. Address: Same
f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____

h. Owner's Phone No.: _____

h. WASTE CODE M1 - 687 - 060526 - ah 2927 - 515j. Description of Waste C-Soilk. Quantity 37.87 Units Type

Y	TR
---	----

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations; AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

Generator Authorized Agent Name [Signature]Signature [Signature]Shipment Date 11-23-05

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Section II

TRANSPORTER

TRANSPORTER I

a. Name: Larry J. [Signature]
b. Address: 30906 W. [Signature]
Bellville MI 48311
c. Driver Name/Title: _____
PRINT/TITLE
d. Phone No.: _____ e. Truck No.: 89
f. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

g. [Signature]

--	--	--	--	--	--	--	--	--	--

 Shipment Date

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
PRINT/TITLE
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____

--	--	--	--	--	--	--	--	--	--

 Shipment Date

Section III

DESTINATION

a. Site Name: Arbor Hills Landfill
b. Physical Address: 10690 W. 6 Mile
Northville, MI 48167

c. Phone No.: 248-449-1886
d. Mailing Address: _____

e. TICKET No.: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

i. Jim AtchisonSignature [Signature]Receipt Date 11-23-05

DESTINATION RETAIN

509911



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011829

Section I GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp.
c. Address: 322 W. Main St
Morenci, MI 49256
e. Phone No.: 248-589-4830

b. Generating Location: _____
d. Address: Same
f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____
h. WASTE CODE M1 - U87 - 060526 - ah 2927 - 515
j. Description of Waste C - Soil

h. Owner's Phone No.: _____

k. Quantity 30.14 Units Y Type TR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly identified, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

30.14 Tons
UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Generator Authorized Agent Name

Signature

Shipment Date

Section II TRANSPORTER**TRANSPORTER I**

a. Name: Farmer Industries
b. Address: 740 Bayview Ave
Bellville, MI 48111
c. Driver Name/Title: _____
d. Phone No.: 734 445 1724 e. Truck No.: 150
f. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

g. [Signature] 060105
Driver Signature Shipment Date

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____ 060105
Driver Signature Shipment Date

Section III DESTINATION

a. Site Name: Arbor Hills Landfill
b. Physical Address: 10690 W. 6 Mile
Northville, MI 48167

c. Phone No.: 248-449-1886
d. Mailing Address: _____

e. TICKET No.: 510183
I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. [Signature] [Signature]
Name of Authorized Agent Signature

060105
Receipt Date

DESTINATION RETAIN



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011830

on I

GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp.
c. Address: 322 W. Main St.
Morenci, MI 49256
e. Phone No.: 248-589-4830

b. Generating Location: _____
d. Address: Same
f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____
h. WASTE CODE MI - 687 - 060526 - ah2927 - 515
j. Description of Waste C - Soil

h. Owner's Phone No.: _____
k. Quantity 52.31 Units Type TR

			40	Y	TR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

Chris Holmes
Generator Authorized Agent Name

Signature

6/10/54
Shipment Date

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Section II

TRANSPORTER**TRANSPORTER I**

a. Name: James Lindstrom
b. Address: 1401 Bayviewville
Bellville Mich 48011
c. Driver Name/Title: _____
PRINT/TITLE
d. Phone No.: 313-443-5140 e. Truck No.: 185
f. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

g. [Signature] 6/10/54
Driver Signature Shipment Date

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
PRINT/TITLE
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____ 6/10/54
Driver Signature Shipment Date

Section III

DESTINATION

a. Site Name: Arbor Hills Landfill
b. Physical Address: 10690 W. 6 mile
Northville, MI 48167
e. TICKET No.: _____

c. Phone No.: 248-449-1886
d. Mailing Address: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. Jim Akhisar 6/10/54
Name of Authorized Agent Signature Receipt Date

DESTINATION RETAIN

5/10/54



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011831

Section I

GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp. b. Generating Location: _____
c. Address: 322 W. Main St. d. Address: Same
Morenci, MI 49256
e. Phone No.: 248-589-4830 f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____ h. Owner's Phone No.: _____
i. WASTE CODE MI - 687 - 060526 - ah 2927 - 515
j. Description of Waste C - Soil k. Quantity 4822 Units Type Y TR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

UNITS

P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Generator Authorized Agent Name

Signature

Shipment Date

Section II

TRANSPORTER

TRANSPORTER I

a. Name: Ferris Industries
b. Address: 7401 Fairviewville
Morenci, MI 49256
c. Driver Name/Title: G. Borvick PRINT/TITLE
d. Phone No.: 248-445-1740 e. Truck No.: 144
f. Vehicle License No./State: 5249BIA

Acknowledgment of Receipt of Materials:

g. G. Borvick Shipment Date 060105

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____ PRINT/TITLE
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____ Shipment Date _____

Section III

DESTINATION

a. Site Name: Arbor Hills Landfill c. Phone No.: 248-449-1886
b. Physical Address: 10690 W. 6 Mile d. Mailing Address: _____
Northville, MI 48167
e. TICKET No.: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. Jim Atchison Signature 6-1-05 Receipt Date
Name of Authorized Agent

DESTINATION RETAIN

510048



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011832

Section I GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp.
c. Address: 322 W. Main St.
Morenci, MI 49256
e. Phone No.: 248-589-4830

b. Generating Location: _____
d. Address: Same
f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____
h. WASTE CODE M1 - 687 - 060526 - ah2927 - 515
j. Description of Waste C - Soil

k. Quantity 4338 Units Type

0	0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---	---

Y	TR
---	----

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

[Signature]
Generator Authorized Agent Name

Signature

060526
Shipment Date

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Section II TRANSPORTER**TRANSPORTER I**

a. Name: [Signature]
b. Address: 7401 Ballantyne Ave
Ballantyne, NC
c. Driver Name/Title: _____
PRINT/TYPE
d. Phone No.: 704-485-1792 e. Truck No.: 155
f. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

g. [Signature] 060526
Driver Signature Shipment Date

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
PRINT/TYPE
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____ 060526
Driver Signature Shipment Date

Section III DESTINATION

a. Site Name: Arbor Hills Landfill
b. Physical Address: 10690 W 6 Mile
Northville, MI 48167
e. TICKET No.: _____

c. Phone No.: 248-449-1886
d. Mailing Address: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. Jim Atchison
Name of Authorized Agent

Signature

060526
Receipt Date

DESTINATION RETAIN

510034



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011833

Section I GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp. b. Generating Location: _____
c. Address: 322 W. Main St. d. Address: Same
Morenci, MI 49256
e. Phone No.: 248-589-4830 f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____ h. Owner's Phone No.: _____
i. WASTE CODE M1 - 687 - 060526 - ah 2927 - 515
j. Description of Waste C - Soil k. Quantity 48.64 Units Y Type TR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Generator Authorized Agent Name [Signature] Signature [Signature] Shipment Date 060105

Section II TRANSPORTER

TRANSPORTER I

a. Name: Eastern Industrial
b. Address: 7401 Beaubien Ave
Beaubien, MI 48311
c. Driver Name/Title: Ted Markel
d. Phone No.: 734-435-1742 e. Truck No.: 134
f. Vehicle License No./State: RT 7637

Acknowledgment of Receipt of Materials:

g. [Signature] Shipment Date 060105

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____ Shipment Date _____

Section III DESTINATION

a. Site Name: Arbor Hills Landfill c. Phone No.: 248-449-1886
b. Physical Address: 10690 W. 6 Mile d. Mailing Address: _____
Northville, MI 48167
e. TICKET No.: A509971

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. [Signature] Signature [Signature] Receipt Date 060105
Name of Authorized Agent

DESTINATION RETAIN



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011834

Section I GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp. b. Generating Location: _____
c. Address: 322 W. Main St. d. Address: Same
Morenci, MI 49256
e. Phone No.: 248-589-4830 f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____ h. Owner's Phone No.: _____
h. WASTE CODE MI - 687 - 060526 - ah 2927 - 515
j. Description of Waste C - Soil k. Quantity 40.14 Units Type TIR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

Greg Holmes
Generator Authorized Agent Name

Signature

Shipment Date

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Section II TRANSPORTER

TRANSPORTER I

a. Name: Farmers Intermodal
b. Address: 7401 Bayviewville
Bellville, Mo. 64611
c. Driver Name/Title: Mike St. Louis
PRINT/TITLE
d. Phone No.: 314 435 1740 e. Truck No.: 158
f. Vehicle License No./State: 62 603

Acknowledgment of Receipt of Materials:

g. Mike St. Louis 06/01/05
Driver Signature Shipment Date

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
PRINT/TITLE
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____ 06/01/05
Driver Signature Shipment Date

Section III DESTINATION

a. Site Name: Arbor Hills Landfill c. Phone No.: 248-449-1886
b. Physical Address: 10690 W. 6 Mile d. Mailing Address: _____
Northville, MI 48167
e. TICKET No.: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. Jim Atchison 6-1-05
Name of Authorized Agent Signature Receipt Date

DESTINATION RETAIN

510003



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011835

Section I

GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp.
c. Address: 322 W. Main St.
Morenc, MI 49256
e. Phone No.: 248-589-4830

b. Generating Location: _____
d. Address: Same
f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____
h. WASTE CODE MI - 687 - 060526 - ah2927 - 515
j. Description of Waste C - Soil

h. Owner's Phone No.: _____

k. Quantity 35.65 units Type Y TR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations; AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

Generator Authorized Agent Name

Signature

Shipment Date

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Section II

TRANSPORTER

TRANSPORTER I

a. Name: Farmer Industries
b. Address: 7401 Rainbowville
Bellville, MO 63111
c. Driver Name/Title: Sharon Lacy
PRINT/TITLE
d. Phone No.: 3344351742 e. Truck No.: 149
f. Vehicle License No./State: RN3266

Acknowledgment of Receipt of Materials:

g. [Signature] 060105
Driver Signature Shipment Date

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
PRINT/TITLE
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____ 060105
Driver Signature Shipment Date

Section III

DESTINATION

a. Site Name: Arbor Hills Landfill
b. Physical Address: 10690 W. 6 mile
Northville, MI 48167
e. TICKET No.: _____

c. Phone No.: 248-449-1886
d. Mailing Address: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

i. Jim Atchison
Name of Authorized Agent

[Signature]
Signature

6-1-05
Receipt Date

DESTINATION RETAIN

509987



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011836

Section I GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp. b. Generating Location: _____
c. Address: 322 W. Main St. d. Address: Same
Morenci, MI 49256
e. Phone No.: 248-589-4830 f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____ h. Owner's Phone No.: _____
h. WASTE CODE MI - 687-060526-ah2927-515
j. Description of Waste C-Soil k. Quantity 36.80 Units Type TR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Generator Authorized Agent Name [Signature] Signature [Signature] Shipment Date 06/01/05

Section II TRANSPORTER

TRANSPORTER I

a. Name: Farmer (Hickorywood)
b. Address: 7401 BAYVIEWVILLE
Bellville Mich 48011
c. Driver Name/Title: LEE ROMAN
PRINT/TYPE
d. Phone No.: 334485-1740 e. Truck No.: 157
f. Vehicle License No./State: RT 2635

Acknowledgment of Receipt of Materials:

g. [Signature] Shipment Date 06/01/05

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
PRINT/TYPE
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____ Shipment Date _____

Section III DESTINATION

a. Site Name: Arbor Hills Landfill c. Phone No.: 248-449-1886
b. Physical Address: 10690 W. 6 mile d. Mailing Address: _____
Northville, MI 48167
e. TICKET No.: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. Jim Atchison Signature [Signature] Receipt Date 6-1-05
Name of Authorized Agent

DESTINATION RETAIN

510063



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011837

Section I GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp. b. Generating Location: _____
c. Address: 322 W. Main St. d. Address: Same
Morenci, MI 49256
e. Phone No.: 248-589-4830 f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____ h. Owner's Phone No.: _____
h. WASTE CODE M1 - 687 - 060526 - ah 2927 - 515
j. Description of Waste C- Soil k. Quantity 37.79 Units Type TR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

Generator Authorized Agent Name

Signature

Shipment Date

UNITS

P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Section II TRANSPORTER**TRANSPORTER I**

a. Name: L & D Trucking
b. Address: 50966 W. 1st St.
Bedford, MI 49311
c. Driver Name/Title: B. W. Wilder PRINT/TITLE
d. Phone No.: _____ e. Truck No.: 84
f. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

g. [Signature] Shipment Date 06/01/05

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____ PRINT/TITLE
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____ Shipment Date _____

Section III DESTINATION

a. Site Name: Arbor Hills Landfill c. Phone No.: 248-449-1886
b. Physical Address: 10690 W. 6 Mile
Northville, MI 48167 d. Mailing Address: _____
e. TICKET No.: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. Jim Atchison Signature [Signature] Receipt Date 6-1-05
Name of Authorized Agent

DESTINATION RETAIN

5/10/78



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011838

Section I

GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp.
c. Address: 322 W. Main St.
Morenc, MI 49256
e. Phone No.: 248-589-4830

b. Generating Location: _____
d. Address: Same
f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____
h. WASTE CODE M1 - 687 - 060526 - ah 2927 - 515
j. Description of Waste C - Soil

h. Owner's Phone No.: _____
k. Quantity 42.67 Units Type Y TR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Generator Authorized Agent Name

Signature

Shipment Date

Section II

TRANSPORTER

TRANSPORTER I

a. Name: L-D Trucking
b. Address: 50906 Montz
Bellefontaine, OH 45111
c. Driver Name/Title: _____
d. Phone No.: _____ e. Truck No.: 57
f. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

g. Driver Signature [Signature] Shipment Date 06/01/05

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. Driver Signature _____ Shipment Date _____

Section III

DESTINATION

a. Site Name: Arbor Hills Landfill
b. Physical Address: 10690 W. 6 mile
Northville, MI 48167
e. TICKET No.: _____

c. Phone No.: 248-449-1886
d. Mailing Address: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. Jim Atchison
Name of Authorized Agent

Signature

6/1/05
Receipt Date

DESTINATION RETAIN

5/10/25



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011840

Section I

GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp.
c. Address: 322 W. Main St
Morenci, MI 49256
e. Phone No.: 248-589-4830

b. Generating Location: _____
d. Address: Same
f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____
h. WASTE CODE M1 - 687-060526 - ah 2927 - 515
j. Description of Waste C- Soil

k. Quantity 513 Units Type

			40
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Y	TR
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TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

Greg H. Jones
Generator Authorized Agent Name

Signature

060105
Shipment Date

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Section II

TRANSPORTER

TRANSPORTER I

a. Name: L & D Trucking
b. Address: 50966 W. 1st
Belleville, MI 48304
c. Driver Name/Title: _____
PRINT/TITLE
d. Phone No.: _____ e. Truck No.: 87
f. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

g. [Signature] 060105
Driver Signature Shipment Date

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
PRINT/TITLE
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____
Driver Signature Shipment Date

Section III

DESTINATION

a. Site Name: Arbor Hills Landfill
b. Physical Address: 10690 W. 6 Mile
Northville, MI 48167
e. TICKET No.: _____

c. Phone No.: 248-449-1886
d. Mailing Address: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. Jim Atchison [Signature]
Name of Authorized Agent Signature

060105
Receipt Date

DESTINATION RETAIN

510457



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011841

Section I

GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp. b. Generating Location: _____
c. Address: 322 W. Main St. d. Address: Same
Morenci, MI 49256
e. Phone No.: 248-589-4830 f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____ h. Owner's Phone No.: _____
i. WASTE CODE MI-687-060526-ah2927-515
j. Description of Waste C-Soil k. Quantity 49.18 Units Y Type TR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations; AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Generator Authorized Agent Name

Signature

Shipment Date

Section II

TRANSPORTER

TRANSPORTER I

a. Name: Zaner Trucking
b. Address: 90900 W. Main St.
Morenci, MI 49256
c. Driver Name/Title: Janice Farmer
PRINT/TITLE
d. Phone No.: _____ e. Truck No.: GR
f. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

g. [Signature] 060105
Driver Signature Shipment Date

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
PRINT/TITLE
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____ 060105
Driver Signature Shipment Date

Section III

DESTINATION

a. Site Name: Arbor Hills Landfill c. Phone No.: 248-449-1886
b. Physical Address: 10690 W. 6 Mile d. Mailing Address: _____
Northville, MI 48167
e. TICKET No.: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. Jim Atchison [Signature] 06-1-05
Name of Authorized Agent Signature Receipt Date

DESTINATION RETAIN

510499



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011842

Section I GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp. b. Generating Location: _____
c. Address: 322 W. Main St. d. Address: Same
Morenci, MI 49256
e. Phone No.: 248-589-4830 f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____ h. Owner's Phone No.: _____
i. WASTE CODE MI - 687-060526 - 515
j. Description of Waste C. Soil k. Quantity 41.85 Units Type TR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Generator Authorized Agent Name

Signature

Shipment Date

Section II TRANSPORTER

TRANSPORTER I

a. Name: L & T Trucking
b. Address: 509 N. Main St.
Bellefonte, PA
c. Driver Name/Title: B. Wilder
PRINT/TITLE
d. Phone No.: _____ e. Truck No.: 84
f. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

g. B. Wilder Shipment Date 06-21-05
Driver Signature

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
PRINT/TITLE
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____ Shipment Date _____
Driver Signature

Section III DESTINATION

a. Site Name: Arbor Hills Landfill c. Phone No.: 248-449-1886
b. Physical Address: 10690 W. 6 Mile
Northville, MI 48167 d. Mailing Address: _____
e. TICKET No.: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. Jim Atkinson Signature 6-21-05 Receipt Date
Name of Authorized Agent

DESTINATION RETAIN

510603



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011843

Section I GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp b. Generating Location: _____
c. Address: 322 W. Main St. d. Address: _____
Morenci, MI 49256 Same
e. Phone No.: 248-589-4830 f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____ h. Owner's Phone No.: _____
h. WASTE CODE: MI - 687 - 060526 - ah 2927 - 515
j. Description of Waste: C - Soil k. Quantity: 1289 Units: Y Type: TR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Green Halonen
Generator Authorized Agent Name

Signature

Shipment Date

Section II TRANSPORTER**TRANSPORTER I**

a. Name: ABC Dynamic
b. Address: 1000 Blackmore
Blackmore Ave.
c. Driver Name/Title: JACK GREENE
PRINT/TITLE
d. Phone No.: 734 486-3575 e. Truck No.: 1617
f. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

g. Jack Green 060105
Driver Signature Shipment Date

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
PRINT/TITLE
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____
Driver Signature Shipment Date

Section III DESTINATION

a. Site Name: Arbor Hills Landfill c. Phone No.: 248-449-1886
b. Physical Address: 10690 W. 6 mile d. Mailing Address: _____
Northville, MI 48167
e. TICKET No.: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. Tim Atchison 6-2-05
Name of Authorized Agent Signature Receipt Date

DESTINATION RETAIN

510892



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011846

Section I GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp.
c. Address: 322 W. Main St.
Morenci, MI 49256
e. Phone No.: 248-589-4830

b. Generating Location: _____
d. Address: Same
f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____
h. WASTE CODE M1 - 687 - 060526 - ab2927 - 515
j. Description of Waste C-Soil

h. Owner's Phone No.: _____
k. Quantity 40 Units Y Type TR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, If the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Generator Authorized Agent Name

Signature

Shipment Date 05/21/05

Section II TRANSPORTER

TRANSPORTER I

a. Name: Zander Trucking
b. Address: 5286 Mertz
Bellville MI 48111
c. Driver Name/Title: Julie Farmer
PRINT/TYPE
d. Phone No.: 734/4877140 e. Truck No.: 98
f. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

g. Driver Signature

Shipment Date

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
PRINT/TYPE
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. Driver Signature

Shipment Date

Section III DESTINATION

a. Site Name: Arbor Hills Landfill
b. Physical Address: 10690 W. 6 mile
Northville, MI 48167
e. TICKET No.: A509 429

c. Phone No.: 248-449-1886
d. Mailing Address: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. Name of Authorized Agent

Signature

Receipt Date 05/21/05

DESTINATION RETAIN



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011847

Section I

GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp.
c. Address: 322 W. Main St.
Morenci MI 49256
e. Phone No.: 248-589-4830

b. Generating Location: _____
d. Address: Same
f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____
h. WASTE CODE M1 - 687 - 060526 ah 2927 - 515
j. Description of Waste C- Soil

h. Owner's Phone No.: _____
k. Quantity 40 Units 7 Type TR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

Greg Holmes
Generator Authorized Agent Name

Signature

053105
Shipment Date

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Section II

TRANSPORTER

TRANSPORTER I

a. Name: Farmer Industries
b. Address: 7401 Ballantyneville
Ballantyneville MI 48011
c. Driver Name/Title: _____
PRINT/TYPE
d. Phone No.: 734-455-1700 e. Truck No.: 155
f. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

g. Phillip P 053105
Driver Signature Shipment Date

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
PRINT/TYPE
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____
Driver Signature Shipment Date

Section III

DESTINATION

a. Site Name: Arbor Hills Landfill
b. Physical Address: 10690 W. 6 Mile
Northville, MI 48167
e. TICKET No.: A509441

c. Phone No.: 248-449-1886
d. Mailing Address: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. Mike Spencer 053105
Name of Authorized Agent Signature Receipt Date

DESTINATION RETAIN



136940

NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011848

on I

GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp.
c. Address: 322 W. Main St
Morenci, MI 49256
e. Phone No.: 248-589-4830

b. Generating Location: _____
d. Address: Same
f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____
h. WASTE CODE MI - 687-060526 - Ah2927 - 515
j. Description of Waste C- Soil

h. Owner's Phone No.: _____
k. Quantity 40 Units Y Type TR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, If the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

Greg Holman
Generator Authorized Agent Name

Signature

053105
Shipment Date

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Section II

TRANSPORTER

TRANSPORTER I

a. Name: Ted M. Keating
b. Address: 7401 Baysideville
Rollingwood, MI
c. Driver Name/Title: Ted M. Keating
PRINT/TITLE
d. Phone No.: 734-449-1740 e. Truck No.: 104
f. Vehicle License No./State: RT 7637 MI.

Acknowledgment of Receipt of Materials:

g. Ted M. Keating 053105
Driver Signature Shipment Date

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
PRINT/TITLE
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____ 053105
Driver Signature Shipment Date

Section III

DESTINATION

a. Site Name: Arbor Hills Landfill
b. Physical Address: 10690 W. 6 Mile
Northville, MI 48167
e. TICKET No.: A509422

c. Phone No.: 248-449-1886
d. Mailing Address: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. Meghan R. [Signature]
Name of Authorized Agent Signature

053105
Receipt Date

DESTINATION RETAIN



NON-HAZARDOUS SPECIAL WASTE MANIFEST

4011849

Section I GENERATOR (Generator completes all of Section I)

a. Generator Name: Henkel Corp. b. Generating Location: _____
c. Address: 322 W. Main St. d. Address: Same
Morenci, MI 49256
e. Phone No.: 248-589-4830 f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____ h. Owner's Phone No.: _____
h. WASTE CODE M1 - 687 - 060526 - ah2927 - 515
j. Description of Waste C- Soil k. Quantity 30.09 Units Type TR

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
DF - FIBRE DRUM
B - BAG
TR - TRUCK
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations: AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

Generator Authorized Agent Name [Signature] Signature [Signature] Shipment Date 05/31/05

UNITS
P - POUNDS
Y - YARDS
T - TONS
Y3 - CUBIC YARDS
O - OTHER

Section II TRANSPORTER**TRANSPORTER I**

a. Name: Farmer Underwood
b. Address: 7401 Bayside
Bullsville Mich 48111
c. Driver Name/Title: Mike Stahl
PRINT/TITLE
d. Phone No.: 7344831740 e. Truck No.: 158
f. Vehicle License No./State: DE 603

Acknowledgment of Receipt of Materials:

g. [Signature] Shipment Date 05/31/05

TRANSPORTER II

h. Name: _____
i. Address: _____
j. Driver Name/Title: _____
PRINT/TITLE
k. Phone No.: _____ l. Truck No.: _____
m. Vehicle License No./State: _____

Acknowledgment of Receipt of Materials:

n. _____ Shipment Date _____

Section III DESTINATION

a. Site Name: Arbor Hills Landfill c. Phone No.: 248-449-1886
b. Physical Address: 10690 W 6 mile d. Mailing Address: _____
Northville, MI 48167
e. TICKET No.: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. Jim Atchison Signature [Signature] Receipt Date 05-31-05
Name of Authorized Agent

DESTINATION RETAIN

509412